

"Soffrin, Cynthia N." <CNSoffrin@lerchearly. com>

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01/20/2005 04:35 PM EST To: <NCR\_Georgetownboathouse@nps.gov>

CC:

Subject: Georgetown University boathouse

To Whom it May Concern:

I understand that Georgetown University is attempting to build a huge boathouse for its own private use on a site withing the C&O Canal National Historic Park. Although the University has offered to trade land that it owns upstream, the exchange is neither fair nor appropriate. The proposed plan is unwarranted use of public land for private purposes. This structure will be a serious intrusion on the canal park. The building would harm the scenic, historic, and recreational value of the site and its surroundings and its construction would block a view of the river from the towpath. Access to the building would create an unacceptable choke point along the Capital Crescent Trailthe towpath. At the very least, preparation of a full Environmental Impact Statement should be required, rather than merely an Environmental Assessment, and alternative sites must be considered in the study.

As a native Washingtonian, I have witnessed many changes in this city. The Canal, however, is such an important historical element that it must remain sacrosanct. I have enjoyed this park many hours alone as well as with family and friends. The enjoyment of the many MUST prevail over the desires of the private few. If this structure is necessary, then Georgetown University must find a different site.

Thank you.

Cynthia N. Soffrin 14955 Dufief Dr. North Potomac, MD 20878



To: <NCR\_Georgelownboathouse@nps.gov>

CC:

Subject: Stop the swap

Please do not permit Georgetown to build any structure upstream of the Washington Canoe Club. Let's consider other options that provide for public access and enjoyment of our parklands.

The land swap is not an equal exchange. Have an certified appraiser value both properties. Enough donors will step forward to buy out Georgetown's interest upstream and turn the lands over to the park service.

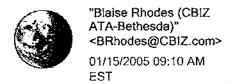
The proposed boathouse is out of scale with other rowing facilities on the Potomac - that is the standard by which it should be judged - not against other boathouses in other cities.

Let's not have our hands tied by the Potomac Waterfront park agreements made 25 years ago before rowing was anywhere near as popular as it is now. If in order to get greater consensus we need to extend the boathouse zone downstream by 200 yards, let's do it.

And please, be sure that the process takes into account the constituents of the national parks, not just a small number who are seen as having "inside influence". A poorly concieved facility will long stand as a reminder to the mistakes we made.

Thank you,

Andrew Soles



To: "'NCR\_Georgetownboathouse@nps.gov" <NCR\_Georgetownboathouse@nps.gov>

CC:

Subject: Boathouse issues...

January 14, 2005

To my friends and representatives at the NPS:

The proposed Georgetown boathouse is far too large. It is larger than the original boathouse shown in the waterfront plan. It's larger than the MOA allowed for. It's larger than all other boathouses on the Potomac. In fact, it is larger than all the boathouses of Georgetown's competitors on the East Coast, this despite testimony under oath from Georgetown representatives that the proposal is of "average size." It includes a massive "exercise room" and a rowing tank that could be placed elsewhere. In reality, it appears to be a fundraising venue billed as an athletic facility.

The setback from the river is inadequate. Seven feet to fifteen is much too close to the Potomac and inconsistent with the setback of the only other nearby structure.

The public is not well informed as to the scale of this proposal. Why hasn't Georgetown created a scale model of the proposal for the public to view? Clydes' created one when they proposed a floating restaurant. It would be an informative way to let the public judge the appropriateness of the structure to be built on public land.

The best argument in terms of benefit to the public I've heard is from the high school rowers. Yet this enormous structure will free up only a limited number of spaces at Thompson's. What is the minimum size and minimum height structure required to provide public benefit derived by removing Georgetown University's shells from Thompson's Boat Center? Given that this is Park land, would it not serve the public as well or better to permit only the construction of the smallest design that would free the same number of spaces?

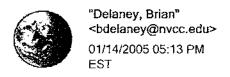
I've been to Philadelphia's Boathouse row many times. It's been stated that that is the type of environment that the Potomac Waterfront Plan was intended to create. This GU proposal does nothing of the sort. It would overwhelm Philadelphia's Boathouse Row.

The canal itself is known to leak. What potential damage can current placement of the Boathouse cause to the canal embankment? What damage would the building of a much smaller boathouse do? What risks does the current design create for the century-old, very fragile, Washington Canoe Club, especially during floods?

The current proposed site has some significant inherent issues and risks in terms of river safety and the natural traffic patterns currently used by rowers and paddlers. What alternative sites and designs have been and should be considered?

Please consider all these issues. There are many others. This project is seriously flawed and needs to be either greatly reduced in scale or halted.

Sincerely,



To: "NCR\_Georgetownboathouse@nps.gov," <NCR\_Georgetownboathouse@nps.gov.>

cc: (bcc: NCR Georgetownboathouse)

Subject: Georgetown Boathouse

Dear NPS:

I am a recreational paddle and biker who regularly uses the river and the Crescent trail. I have followed the discussion of the Georgetown Boathouse project in the newspaper and have attended a public meeting on the issue.

As a citizen, a taxpayer, a biker, a paddler, and a person who is interested in fairness and the public interest, I cannot for the life of me figure out how this project has gotten this far in the consideration process.

The boathouse represents an expensive, professionally crafted eyesore on the banks of our river, next to our bike trail and our C O Canal. What conveivable claim to that space does Georgetown University possibly have—save the manipulative land swap process that trades relatively useless up river land for the very valuable downriver site? Power and influence should not determine the rightness of a project. Can there be any doubt that the size of the design is intended to give the university a very lovely clubhouse on the Potomac? When the architects discussed the design at the meeting I attended last summer, they could not come up with a resonable justification for the project's size.

The project puts the very fragile river environment in on-going harm's way. From the impact of the construction project, to the problems created by changes in the river flow during flood stage, to the long term status of the large sewer pipe under the sight: all these are matters of serious concern.

Stop the madness and make Georgetown act in the best interests of the larger community rather than granting them the right to have a facility that is so self-indulgent and excessive that it takes one's breath away.

Sincerely,

Brian J. Delaney 560 N. St SW Washington, D.C. 20024

bdelaney@nvcc.edu



David Hertzfeldt <davidandbobbie@yah oo.com>

01/14/2005 07:45 AM PST To: ncr\_georgetownboathouse@nps.gov

cc: seawaik@starpower.net

Subject: GWU boathouse proposal

To: National Park Service Representatives

From: David Hertzfeldt

2537 Queen Annes Lane, NW Washington, DC 20037

Re: Georgetown boathouse proposal

My family and I wish to express our strong opposition to the George Washington University boathouse proposal. Our reasons include the following:

- 1) No part of the C&O Canal National Historical Park should ever be considered for sale, trade or long term lease. It is public and must remain public.
- 2) To allow a monstrosity to be built on precious public waterfront is unconscionable. Such shortsighted action would and should be subject to landmark litigation by an outraged public.
- 3) The proposal comes from the second largest real estate owner in Washington. GWU property assessments exceed a billion dollars. Let us not assume the boathouse proposal is primarily coming from a community minded institution of learning. Real estate cooperations are by nature profit driven.
- 4) The forms of environment degradation from GW's proposal are too numerous to address. If not politically restrained, required impact studies will quickly support the proposal's ludicrous nature.

Your consideration of my family's concerns is appreciated.

Do you Yahoo!?

Take Yahoo! Mail with you! Get it on your mobile phone.

http://mobile.yahoo.com/maildemo

Office of Lands, Resources and Planning National Capital Region National Park Service 1100 Ohio Drive, SW Washington, DC 20242

To Whom It May Concern:

Topic: The Plan to Convert National Historical Park Land to Private Use.

Let us go to the heart of the boathouse issue. The plan, devised under the direction of John Parsons, to transfer property of the C&O Canal NHP to Georgetown University for the construction of a private boathouse facility, is indefensible on its face. The plan would extend to Georgetown the power to carve out a prime parcel of the park for its own use. That private use has nothing to do with the public uses and purposes of this national historical park. The parcel that would be taken begins the swath of protected corridor between the canal and the river that extends to Cumberland. It has long been the policy of the park that the land between the canal and the river, wherever possible, remain in its natural state and free of intrusive development. Basic park policy through the years has been devoted to using its authority to "round out" boundaries and to gradually close out "in-holdings" for private use. This policy has flowed from the enabling legislation passed by Congress that created the park. A Georgetown boathouse, any boathouse, would be a total reversal of this fundamental policy of the C&O Canal National Historical Park; namely, the conversion of national park land to private use. It would disregard the will and intention of Congress in the park legislation.

Not only does the boathouse plan run hard against the National Park Service's primary obligation to preserve park land in general, but specifically to protect the corridor of the canal park from encroachment by those pursuing interests at odds with park purposes.

The Georgetown Boathouse plan, if carried out, would create a threat to the integrity of the C&O Canal National Historical Park. It would set a precedent tempting others to follow suit in seeking to acquire park land for private or other uses. This ought not happen and is avoidable simply by selecting an alternate site downriver. Since the opposition to the boathouse

plan is not opposed to boating on the river, choice of an alternate site would end most opposition.

The planning process up to the recent park service decision to do an EA strongly indicates that Georgetown is bent on getting the above site as its own and it pulling out all the stops in getting its way. Georgetown has shown no self restraint in the pursuit of a mammoth boathouse at the site. The original 4000 sq ft footprint has transmogrified into a 19,000 sq ft footprint. Georgetown evidently sees our national historical park as fair game. When offered the modest parcel Georgetown intends to take just shy of five times its size. Further, along the way Georgetown scorns the MOA agreed to between the University and the agents of the park service. It has become clear to all that the proposed boathouse is designed both for boating and is ideal for large parties. The interior amounts to some 33,000 sq. ft. of floor space. The designers have paid no attention to the blockage of the view shed from the canal towpath that would result from such a large building or showed concern for the impact of such a large construction upon the canal wall. All this happens without a murmur of objection from the NPS. It appears that Georgetown is afflicted by pleonexia, the Greek for taking more than your share.

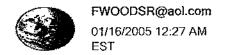
Further, there is no evidence to show that the 45-foot wide strip of land owned by GU upstream and which GU wants to swap for the much larger site situated below the university was ever seriously considered as the site for a boat house. That site appears to be unusable for this purpose and it appears that the first assessor knew what he was talking about when he said it is unbuildable.

Since there are alternatives to this planned take over of canal park land it is hard not to ask: "Does the park service have no will of its own in this matter? Does it have the will to do what is right? If the park service does decide to do what is right and proposes an alternative site, the opposition to the GU boathouse would fall away. The opposition is not opposed to rowing competitions on the Potomac only to Georgetown usurping a piece of the C&O Canal NHP for its boathouse.

Carl A. Linden

Kenneth Rollins

(Linden and Rollins are former presidents and current members of the Board of Directors of the C&O Canal Association. Linden is chair and Rollins a member of the Association's Projects Committee.



To: NCR\_Georgetownboathouse@nps.gov

CC

Subject: Against boathouse

I am opposed to the building of a boathouse for Georgetown U. on any property now under the control of the C&O Canal National Park.

This would greatly affect the historical and natural appearences of this area of the park.

Fred Wood

301-271-1104



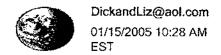
"Neil K. Williams" <nkwilliams@starpower .net>

01/13/2005 07:07 PM EST To: <NCR\_georgetownboathouse@nps.gov>

CC

Subject: Don't Build Georgetown Boathouse

I would like to express my opposition to the overly large boathouse that has been proposed. It would damage parkland, make access to the Capital Crescent Trail more difficult, and increase congestion in the limited space now available to the public for small boat launches.



To: NCR\_Georgetownboathouse@nps.gov

cc: susan@collins.senate.gov, olympia@snowe.senate.gov

Subject: BOATHOUSE

WE ARE OPPOSED TO THE "GEORGETOWN" GROUP ATTEMPTING TO BUILD THE "NEW" BOATHOUSE !!
WE LIVE IN MAINE AND TRY AND KEEP THINGS "SMALL" AND HAVE BEEN MEMBERS OF C&O FOR YEARS

WE WILL CONTACT BOTH SENATORS SNOWE AND COLLINS

SINCERELY/

RICHARD DAVY--Wrd associates
418 Danforth Street

PORTLAND;ME. 04102 Phone: 207-871-9285 // fax: 207-772-3870



To: NCR\_Georgetownboathouse@nps.gov

cc: Subject: Boathouse C & O Canal

Do not build it. Build it and they will come. Dennis W Hibbard.



Rita Marth <marth@attglobal.net>
01/17/2005 08:12 AM
EST
Please respond to To: NCR\_Georgetownboathouse@nps.gov

CC:

Subject: proposed construction of Georgetown University boathouse

I urge you not to allow construction of this boathouse as presently designed. It will be disruptive both visually and in terms of access for users of the C & O Canal and the Capital Crescent Trail. It also establishes (another) poor precedent of allowing private use of public lands.

Sincerely, Rita Marth 7308 Cedar Avenue Takoma Park, MD 20912

rmarth

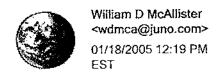


"edwinna bernat" <edwinnab@citlink.net> 01/17/2005 11:09 PM EST To: <NCR\_Georgetownboathouse@nps.gov>

Subject: Protest

I would like to submit my protest against the construction of the Georgetown Boathouse on National Park property. This is an unprecedented proposal and I can only think that someone is being paid off. Edwinna Bernat

C & O Canal Association Member



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To: NCR\_Georgetownboathouse@nps.gov

CC:

Subject: Comments of boathouse

I support the positions of the C&O Canal Association and the Canoe Cruisers Association opposing the construction of the Georgetown Univ. boathouse.

William D. McAllister 5500 Cordona Street Lanham MD 20706-4116

301-577-4757



To: <NCR\_Georgetownboathouse@nps.gov>

Subject: Opposed to proposed Georgetown University Boathous

Office of Lands Resources and Planning, National Capital Region, National Park Service, 1100 Ohio Drive, SW, Washington, DC 20242.

To whom it may concern:

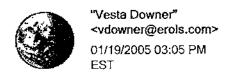
I am a frequent user of both the C&O Canal and the Capital Crescent Trail and have been for many years. I am wholly and completely opposed to the building of the GU Boathouse within the C&O Canal National Historic Park.

I am surprised and shocked that the National Park Service would allow a private interest Group such as Georgetown University to build something on public land that would ONLY benefit that group's members and not the public as a whole. Not only would it just benefit a few but it would negatively impact the rest of the users of the canal and the capital crescent trail. Washingtonians and tourists alike would not be able to enjoy the full beauty of the park land.

In Addition, I believe this proposed boathouse would have a detrimental impact on the environment and natural wildlife and flora in that area.

I request my comments be added to the public record of the GU boathouse Environmental Assessment.

Sincerely, Laila Linden 6406 Ridge Drive Bethesda, Maryland 20816



To: <NCR\_Georgetownboathouse@nps.gov> cc:
Subject:

Please give careful consideration to all the citizen concerns being expressed about your proposal to convert a section of the canal parkland into your boathouse and party arena. This is too valuable a part of our public treasure to be lost to this narrow and limited use.

Sincerely, Vesta S. Downer



"Geoff Gray" <geoffgray@tonygray.n et>

01/20/2005 11:22 AM EST Please respond to "Geoff Gray"

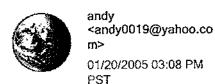
To: <NCR\_Georgetownboathouse@nps.gov>

cc:

Subject: GU boathouse

I object.

Geoff Gray 6909 Ayr lane Bethesda, MD 20817



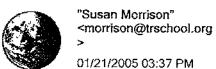
To: NCR\_Georgetownboathouse@nps.gov cc: Subject:

As a native Washingtonian, I am strongly opposed to the building of such a monstrocity right in the middle of one of the most beautiful parts of DC and would appreciate my opposition on record.

Sincerely,

Andrew Hendrickson

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To: <NCR\_Georgetownboathouse@nps.gov>

ÇC

Subject: Opposed

01/21/2005 03:37 PM EST

I am opposed to the Georgetown Boat House being built within the C & O Canal historic national park due to the necessity of keeping this wooded park land in its natural state and not marring the view of the Potomac on this historic scenic route.

Dr. Susan S. Morrison, Ph.D., LPC Clinical Counselor - Sequoia Unit (540) 888-3456 ext. 136 morrison@trschool.org

## SCOPING COMMENTS PROPOSED GEORGETOWN UNIVERSITY BOATHOUSE IN C&O CANAL NATIONAL HISTORICAL PARK AND CONSEQUENT LAND SWAP

Subnitted by: AMBER JONES
128 B North Bedford Street, Arlington, VA 22201

<u>aliones101@juno.com</u>
phone 703-525-7034

January 19, 2005

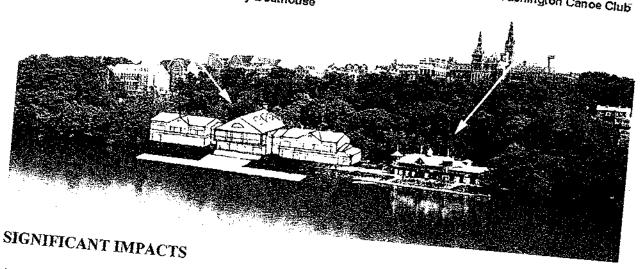
TO: Office of Lands, Resources and Planning; National Capital Region; National Park Service; 1100 Ohio Drive, SW; Washington, D.C. 20242. Please make this document and attachments part of the public record of scoping on this proposal.

#### SUMMARY

The proposal to site a large recreational facility for private use in a heavily used public area of the C&O Canal National Historical Park will have significant impacts on the environment and natural resources, including floodplains, wetlands, water quality, and fish and wildlife; and on the human environment and use, including views, danger to historic structures, safety on the river and on land, ease of public access, ease of private Georgetown University access, traffic, and parking.

Because of the significant impacts, NEPA and CEQ require preparation of an Environmental Impact Statement that considers alternative locations, sizes, and types of boathouses (private and public). The planned construction of additional private and public boathouses along the nearby riverfront and across the river on national parkland in the Arlington, Virginia riverfront indicates the need for a comprehensive EIS on cumulative impacts. The EIS being prepared for the Arlington facility sets a precedent for the necessity of an EIS on the DC boathouses in C&O Canal and Rock Creek National Parks.

The sketch below, provided by a coalition of non-profit groups called Defenders of Potomac River Parkland, illustrates the Georgetown boathouse as currently proposed – about the length of a football field, seven times larger than the adjacent century-old Washington Canoe Club, crowded into a narrow and heavily-used corridor of national parkland. Some of the impacts are immediately obvious – the view, the impact on the riverbank, the amount of vegetation to be removed, the structural danger to the adjacent historic building. Other impacts are not as obvious – the restriction of access to the Capital Crescent Trail used by commuters, the potential for erosion, silting, and increased floodwater flow, and the obstruction of river views from the C&O Canal and towpath and Canal Road. The enormous size in comparison to the adjacent facility, which houses an Olympic boating team, raises questions about the need for such a large facility.



According to NPS Directors Order 12 (B) Criteria, the following impacts may be significant and require an EIS; I have listed for each the impacts of that type that I believe will be significant in the

# 1) Impacts that may on balance be beneficial, but may have significant adverse impacts also.

The National Park Service claims there are invasive species on the land proposed for the boathouse that need to be removed. But the impact of stripping the land of vegetation may be greater, because it eliminates natural shade that helps cool the city; open space as designated in the C&O park plan and in the DC Comprehensive Plan; wooded views for users of the river, Capital Crescent Trail, and C&O Canal and towpath; fish and wildlife habitat; and natural floodwater absorption by soils and

# 2) The degree to which public health and safety are affected.

The are physical impacts on users of Capital Crescent Trail, including hikers; bicyclists, including the any daily bike commuters; families with baby strollers, which are common on the trail; joggs; rollerbladers, and others. Impacts include constricted trail traffic and potential for collins due to moving and narrowing the trail; safety problems and potential for collision from largenstruction equipment and long boat trailers carrying 60-foot-long, sharply pointed boats trave, an access road alongside the trail; and safety problems and potential collisions from these

The real impacts of adding Georgetown University's 60-foot-boats and 75-foot fixed docks in a busy ational corridor of the Potomac River include the following: safety impact on recreal boaters among the general public who use this particular section along the riverbank; potenbwding of boaters by eliminating a large section of river from their use; potential collishe to crowding, whether recreational boaters launching from Thompsons Boat Center, Jacks, ac Boat Club, Washington Canoe Club, and other locations along the Georgetown waterfill be forced into deeper water, causing additional safety problems; impact on the

Olympic team from Washington Canoe Club that trains in the corridor designated for launching boats from the Georgetown University docks, including safety of both teams, and increased

Impact on water quality of increased runoff, including chemical and hazardous materials used during construction and washed into the river by rain and erosion; chemicals, oils, and other substances used in a boathouse routinely; and all substances on the site, including chlorine in rowing pools, entering the river during a flood.

### 3) Unique characteristics of the area (proximity to historic and cultural resources, wild and scenic rivers, ecologically critical areas, wetlands or floodplains). In this category are:

The site is on the historic, scenic Potomac river and is adjacent to historic and cultural resources, including C&O Canal and towpath that Justice William Douglas fought hard to preserve for the public; Washington aqueduct, at the entrance to the proposed access road; Washington Canoe Club, a century old structure that predates the park and other structures along the Georgetown waterfront downstream and which would be closely crowded by the proposed boathouse.

The site is on a floodplain that experiences floods frequently. Changes in hydrology due to replacing vegetation and soils at this site with a building, concrete pads, and docks may increase volume and flow rate of floodwaters along the riverbank reaching the Washington Canoe Club and downstream Georgetown riverfront. Behind the building, forcing floodwaters into a narrow corridor between the massive building and the C&O Canal embankment, potentially endangers the foundation of the canal and towpath. Changes in river flow at all times, but especially during floods, poses danger to the century-old Washington Canoe Club, which is a protected historic structure, and its floating docks. Also there is a potential for Georgetown University's fixed docks to loosen and cause considerable erosion to site and downstream damage during floods.

The physical impact of vibration, noise, digging, erosion, potential collision from construction vehicles and boat trailers, and other construction and building operation features could affect the Washington Canoe Club, aqueduct and other adjacent historic structures, which predate the national park and are protected by historic preservation laws.

### 4) The degree to which impacts are likely to be highly controversial.

The considerable opposition expressed by citizen organizations -- including the American Canoe Association, American Whitewater Association, Audubon Naturalist Society, Canoe Cruisers Association, C&O Canal Association, Coalition for the Capital Crescent Trail, DC Chapter of The Sierra Club, Friends of the Earth, League of Women Voters of DC, National Parks Conservation Association, Potomac Conservancy, Potomac Peddlers Touring Club, and Washington Canoe Club -- as well as the participants in the January 11 scoping meeting, confirm the impacts are likely to be

The fact that the National Park Service did not comply with NEPA until a lawsuit was filed makes the proposal and its impacts even more controversial (see Legislative Considerations, below).

The C&O area is a National Historical Park because of the riverfront and canal area's significance to our nation's history. The park plan, as developed by National Park Service and C&O Advisory Commission, requires preservation of the historic structures -- which include the riverfront, old

railroad bed that now houses the Capital Crescent Trail, the historic buildings, and the C&O Canal and towpath – for public enjoyment. Adding a new, large, modern, private building is extremely controversial.

Among other impacts is the public perception of unfairness that a parcel of land with historical and cultural resources (C&O canal and surroundings), which also has environmental value (habitat and green space), which has been preserved for open recreational access by the public (particularly boaters and anglers and others hiking or picnicking under the trees along the shore as well as, more recently, users of the Capital Crescent Trail) will be restricted and blocked by a massive new building without offering much benefit to the public, such as access to the building, docks to launch private boats, or boat rentals. Access to the river is irrelevant, since people have that now.

These impacts require evaluation of whether the expressed opposition is representative of the general public, whether the expressed opposition constitutes a significant impact in and of itself, and whether the expressed opposition indicates without a doubt that there are significant and controversial impacts to the human and natural environment from this proposal which require an EIS and consideration of more acceptable alternatives.

## 5) The degree to which impacts are uncertain or involve unique or unknown risks.

No one knows what kind of public outcry will begin when construction trucks actually show up at the entrance to the C&O Canal National Historical Park and Capital Crescent Trail. Since the National Park Service has not publicized or widely reported the original proposal over the years or its scoping period or scoping meeting, no one knows how many more people will care about this project when they find out due to the launch of physical construction activity. (After a press release in fall of 2004, no press release was issued on the January scoping period, and people like me who participated in the historical review process earlier and subsequently asked twice, by phone and by email, to be notified were NOT notified, but had to rely on other citizens to find out.)

There may be a sociological impact on the regional boating and academic community of granting this amount of private space in a prime location to one individual school, and denying that amount of private space in a prime location to other schools, who are forced to share one public facility.

The precedent for allowing one school to acquire a large parcel of parkland for exclusive use raises a question of whether other schools will request similar parcels for boathouses along the Potomac riverfront and in other national parks. Already, George Washington University is planning a similar request along the Potomac.

# 6) Whether the action may establish a precedent for future actions with significant effects, or represents a decision in principle about a future consideration.

There is a question whether the proposal is in the public interest – national parkland would be sacrificed to private development, destroying habitat and obstructing the public's access to its current recreational activities in the vicinity. This raises the question of whether the National Park Service will consider the public intersest in the future and in other national parks.

This proposal raises the question of the fairness of placing new boathouses for private use rather than boathouses for public use in national parks.

The swapping of land that is contained in and is essentially part of the C&O Park - and is probably unbuildable due to its topography and lack of access - for prime real estate in an easily accessible location (near the headquarters of the private entity that wants it for its private use) - sets a precedent for private entities around the country which would like to own and operate a private facility inside a beautiful national park with easy access for their constituents.

George Washington University is already planning to follow Georgetown University and seek a land swap for similar purposes - so the precedent has already been established.

The economic value of swapping a parcel of land of undetermined value, but most likely unbuildable, in a remote setting of the C&O Park, for a prime parcel in a public setting, which gets thousands of visitors and users each week, raises the question about whether this proposal in the public economic interest.

Thus, several aspects of the proposal threaten the reputation of the National Park Service for exercising wise stewardship of public environmental, historical, and cultural resources.

In addition, the National Park Service is ignoring a precedent set by a related action across the river in the George Washington Memorial Parkway national parkland, Arlington, VA, where a publicly owned and operated boathouse serving the needs of multiple schools and the public is proposed, and where the National Park Service conducted a highly publicized public scoping period, with sincere attempts to solicit public participation, and where an Environmental Impact Statement is being prepared. The inconsistency of the two actions is raising a public outcry.

#### 7) Whether the action is related to other actions that may have individual insignificant impacts but cumulatively significant effects.

CEQ requires an agency to "examine connected actions, cumulative impacts, secondary or indirect impacts and similar actions" in a single NEPA document.

NPS Reference Manual #77, "Environmental Compliance," in the section "Policy and Program Objectives," states "The results of any single park's or region's planning, analysis, and decisionmaking efforts may influence other decisions for the entire National Park System" and "Topics such as how resource use in a park will affect an entire region or ecosystem, how to preserve resources while allowing for appropriate public use and enjoyment, or how a decision now will affect park management options in the very long-term future are the kinds of issues NEPA was designed to emphasize."

The Potomac riverbank in the vicinity of Washington, DC, Maryland, and Arlington and Alexandria, Virginia, constitutes an entire region, physically and socially, that shares the same issues of preservation of resources while allowing for public use and enjoyment.

The National Park Service needs to consider the relationship of the Georgetown boathouse proposal at this site with the plans for additional boathouses in the non-motorized boathouse zone in C&O Canal park and the Georgetown waterfront area managed by Rock Creek National Park, and the cumulative impacts of all of them together.

In addition, the National Park Service should consider the related action across the river in the George Washington Memorial Parkway national parkland, in Arlington, Virginia, where a publicly owned and operated boathouse serving the needs of multiple schools and the public is proposed. The proposals on both sides of the river amplify the impacts on residents, users, and on the Potomac River, including water quality, hydrology, floodplain management and floodwaters, fish and wildlife habitat, utility requirements and placement, and other physical and social impacts.

The cumulative impacts of building multiple boathouses in the non-motorized boathouse zone in addition to one across the river include the issue of whether such buildings will, together, meet the demand by private and public school boating programs as well as providing boat rental, storage, and access to the river for the general public. This requires determining the number of people in the regional school community needing such access; and the number of people among the general public needing such access, then weighing those needs with the need to protect natural resources.

A secondary impact is that the Georgetown University proposal, unlike the Arlington proposal, is raising a larger related question of whether the National Park should encourage placing new boathouses for private use rather than new boathouses for public use in national parks.

Also to be considered is the precedent for allowing Georgetown University to build a 33,000-square-foot facility to replace the 2,000 square feet of space feet it currently uses in the shared space at Thompsons Boat Center; how this precedent will affect the potential for requests by George Washington University, American University, Wilson High School, Georgetown Visitation, National Cathedral School, St. Albans, and other schools in DC as well as schools in Virginia for additional space; and how the National Park Service will meet such requests.

#### Other "connected actions" include:

- Building the new boathouse in this location requires building an access road, which requires
  moving and narrowing the Capital Crescent Trail, potentially restricting use of the trail.
- Building private docks requires removing vegetation along the shoreline, thereby eliminating wildlife habitat and access to the river by hikers, anglers, and picnickers.
- Cumulative impacts of parking and congestion on K Street, which is the nearest parking for all boathouses on the Georgetown waterfront as well as the waterfront park area managed by Rock Creek National Park.
- Cumulative impacts on safety for motorized and non-motorized boaters using the Potomac River from all proposed boathouses along both sides of the river, and for bikers, joggers, and walkers along K Street, Capital Crescent Trail, and Mt. Vernon trail.

#### ADDITIONAL IMPACTS

CEQ regulations require evaluation of physical and environmental impacts. These include:

- Stripping the land of vegetation eliminates natural shade that helps cool the city; open space
  as designated in the C&O park plan and in the DC Comprehensive Plan; wooded views for
  users of the river, Capital Crescent Trail, and C&O Canal and towpath; fish and wildlife
  habitat; and natural floodwater absorption by soils and vegetation.
- Erosion of the riverbank and silting of the riverbed at the site and downstream from construction and operation of the building and docks.
- Disruption of the environment from construction, including digging and placement of utilities.
- Potential for disruption or rupture of the sewer interceptor pipe underlying the site.

CEQ regulations require evaluation of social impacts. These include:

- Sociological impact to residents, users, and visitors of stripping the land of vegetation, eliminating natural shade that helps cool the city; green space as designated in the C&O park plan and in the DC Comprehensive Plan; wooded views for users of the river, Capital Crescent Trail, and C&O Canal and towpath; fish and wildlife habitat; and natural floodwater absorption by soils and vegetation. This impact requires evaluation of whether people prefer public wooded space or buildings in riverfront national parks, and should take into account the National Park Service's responsibility for balancing accommodation of the need for natural resources with the need for public recreation.
- Sociological impacts of eliminating current viewshed of natural, wooded parkland and replacing it with views of a 50-foot-tall building that would tower over the river, the Capital Crescent Trail, 23 feet above the C&O Canal and towpath; and 10 feet above Canal Road (see Exhibit A, attached photo of red balloon marking height of boathouse above Capital Crescent Trail). Requires evaluation of whether public preference is for views of nature rather than views of buildings; whether the change in view is consistent with C&O national park plan and DC comprehensive plan; how many users of the river, Capital Crescent Trail, the C&O Canal and towpath, and Canal Road would be affected by obstructed views of the river; how many viewers along the Virginia waterfront and George Washington Parkway would be affected by changed view; how many months of the year these viewers will be affected; and whether the boathouse would also tower above trees left standing between the boathouse and canal.
- Potential for diminishing the Washington Canoe Club Olympic team's skills by rerouting their training space, and public perception of the value of accommodating the general public and Olympic team in comparison with the value of accommodating one university.
- · Restriction of access to the park during construction.

#### LEGISLATIVE CONSIDERATIONS

NPS Reference Manual #77, "Environmental Compliance," in the section "Policy and Program Objectives," states, "Because the requirements of NEPA include public participation, it is important for parks to maintain an accessible database of environmental documentation, including dates and brief descriptions of projects for which the documentation was done. Environmental documents older than five years should not be relied upon as documentation for new projects or proposals."

Prior to the lawsuit filed by the C&O Canal Association and Washington Canoe Club in late 2004, the National Park Service proceeded with the Georgetown University proposal without fully complying with these NEPA requirements. There was insufficient public participation, documents were not available when members of citizen organizations asked for them, and the National Park Service claimed that an Environmental Assessment prepared 10 years ago – before the Capital Crescent Trail existed and attracted thousands of users – was sufficient.

Thus, the Park Service has undermined its credibility and people do not trust it to fully comply with the law. That distrust is an additional impact that now must be considered in the environmental review.

Furthermore, CEQ 1506.1 requires that "Agencies shall not commit resources prejudicing selection of alternatives before making a final decision." The public record indicates the National Capital Region of National Park Service may not have complied with this requirement. Considerable resources, including the time and salary of NCR employees, were committed to the DC Zoning process and Section 106 Historical Review Process for this particular proposal (a new Georgetown University boathouse at the proposed location) without evaluation and public consideration of alternatives, indicating a final decision was "presupposed" without the appropriate public participation and documentation required by NEPA.

Since GU's proposal is a "proposed action" from an external applicant or "project proponent," and was not in the park plan, it is not necessary that it be considered the "preferred alternative" of the park during the current NEPA review. To fully comply with NEPA, a range of alternatives needs to be developed, one of which may become preferred at the conclusion of the analysis process rather than at the beginning of the process. The preferred alternative must then be identified before the NEPA documentation is released for public review.

Thus, the National Park Service is legally required to consider all economically and technically feasible alternatives equally as it begins the NEPA process. Since it is only now beginning that process, all alternatives should now be "on the table."

#### **ALTERNATIVES**

CEQ requires that if a technically or economically feasible alternative would have profound environmental impacts, it must be eliminated. I consider the impacts listed above to be profound.

CEQ regulations state that one purpose of the environmental review is to establish whether the significant impacts on the environment can be mitigated, and to evaluate the impacts of "all feasible alternatives, including the 'no action' alternative." Many of the significant impacts of the current proposal can be mitigated by moving the location downstream from the portion of C&O park that contains the Capital Crescent Trail and large stands of trees and other vegetation. All locations downstream of the Washington Canoe Club are paved, degraded, previously developed, and contain very little or no vegetation.

NPS Reference Manual 77 states that, according to Council on Environmental Quality, economically and technically feasible alternatives must be considered even if they are not funded by Congress, are outside the park, are in conflict with law, and/or are not in the park planning document. Currently, there are multiple areas downstream from the currently proposed site, but still on the Georgetown waterfront, and still within the non-motorized boathouse zone – that are economically and technically feasible and preferable. Some of these areas are inside and some are outside the C&O Canal National Park.

CEQ states that reasonable alternatives that "show evidence of common sense" and which "resolve the need for action and fulfill the stated purpose for taking action" must be considered.

The following alternatives meet the various criteria described above.

Georgetown University boathouse at the proposed location, no land swap, or no action by the National Park Service to provide new boathouses for private or public use? This needs to be defined for the public to be able to participate in identifying alternatives.

The impacts of the "no action" alternative may be better or worse than the currently proposed plan, but no one can evaluate them until the scope of "no action" becomes clear. The scoping period may need to be recopened in order to provide the public a chance to comment on the potential impacts.

#### Attachments:

Exhibit A: Height of balloon marking top of proposed boathouse in relation to CCT.

Exhibit B: The Dempsey Alternative

Exhibit C: At 34th Street: The Georgetown Universal Boathouse

## EXHIBITA



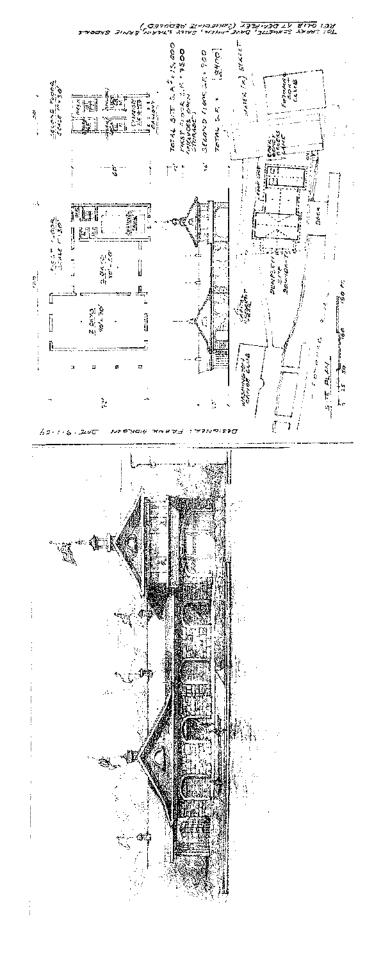
Print Photo | Close



Red balloon make height of purposed 60 boathouse 23 feet above caral 10 feet above caral road

# EXIIBITB

The Dempsey Alternative Better Location, Excellent Size



On the site of the Historic Dempsey Boathouse, between WCC and PBC

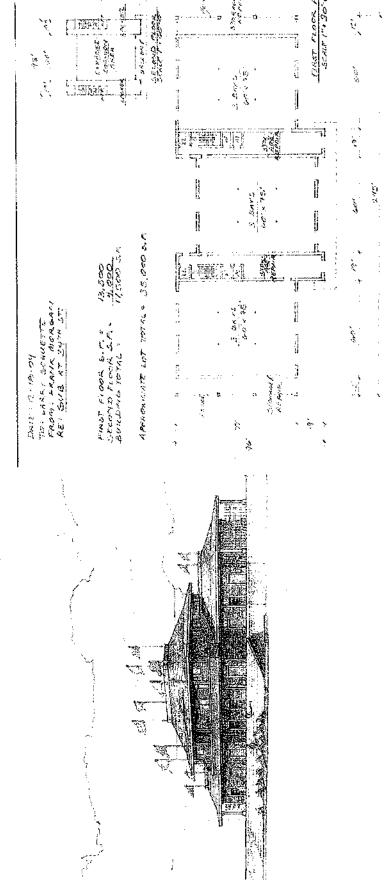
7500 SF Footprint

Room for 28 "8"s, 28 other boats

Main roofline is the same height as WCC (doesn't block the views)

# EXHIBIT

Space for 144 "8"s Could house GU, GWU and the High At 34th Street: The Georgetown Universal Boathouse School Crews!



Just above 34th Street

13, 500 SF Footprint (only 72% of the GU Boathouse) Has 9 full length bays, Room for 144 "8"s! (WOW!) To: Office of Lands, Resources and Planning; National Capital Region

National Park Service 1100 Ohio Drive, SW Washington, DC 20242.

From: David E. Winer (davidwiner@erols.com)

5927 Onondaga Road Bethesda, Maryland

You invited attendees at the January 11th Environmental Assessment Scoping Hearing concerning the proposed Georgetown University Boathouse to furnish written comments for consideration by the National Park Service. Please enter my response, this document, in the official record. I am also sending this document to your e-mail address as message attachments.

David & Wiver

# An Environmental Assessment of the plan for a Georgetown University Boathouse is an inadequate response to the environmental problems created at the proposed location.

The decision to place a boathouse in the C&O Canal National Park above the Washington Canoe Club is misguided. The choice of location came about through an unfair and inadequate planning process of the entire Georgetown Waterfront Park and Non-motorized Boathouse Zone. That planning, of a National park, did not include input from the wider community of affected citizens. Rather, this was an arrangement primarily responding to the desires of organized Georgetown citizens. This restricted participation is a fundamental violation of fairness in planning a National park and must be corrected.

The planning did not acknowledge the overall environment of the unique (in all the world) resource of a wild major river entering a prominent urban setting. Equally disturbing, the planning failed to acknowledge the setting of the area as an extremely valuable, essentially unparalleled, resource for recreational use of the river. Thus, the growing demand of high school and college rowing programs, and of unaffiliated citizens who practice paddle sports, has been effectively ignored.

The result of this planning failure was to restrict severely the boathouse zone, and worse, to extend the zone into the C&O Canal National Park that is wholly unsuited for development, especially development of a private boathouse intruding into a heavily used natural setting.

The current plan for the formerly industrial area below Key Bridge does not take into account the special nature of the waterfront setting and the tremendous opportunity for world-class recreational use. Viewing this large area in its entirety clearly indicates that there is more than adequate space for activities associated with a traditional city park, as well as facilities for non-motorized boating. See Figure 1, from a Terraserver satellite photograph taken in 2002.

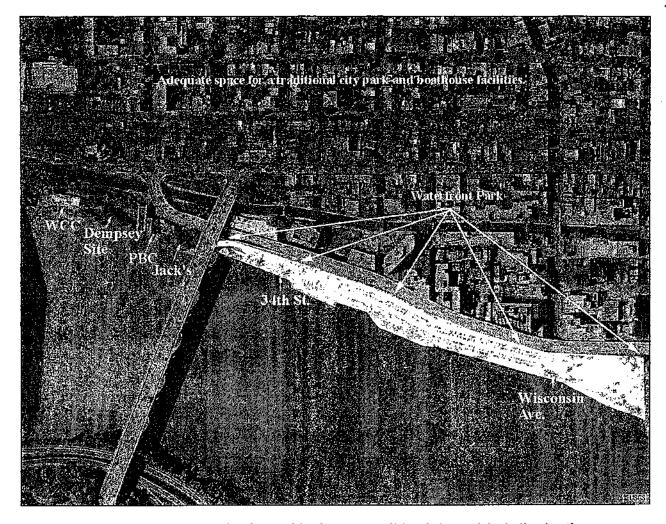


Figure 1. Area for systematic planning for combined uses: a traditional city park including boathouses.

It takes little imagination to envisage a lively and beautiful park across the whole of the Georgetown shoreline, with boathouses and plenty of traditional park amenities. With some inspired and careful planning, our waterfront could well become another pride of the National Capital as a uniquely animated and enchanting attraction alongside the monuments, museums, and other features of the city.

The Park Service is expected to, and should, balance recreation with natural resources. Georgetown Waterfront Park and the boathouse zone are so important to this shoreline that they must be considered together in a systematic plan. Moreover, the uses of the space should be approached as complementary rather than competing. Of great importance, the needs of all citizens in the greater Washington community must be addressed. A comprehensive planning study and Environmental Impact Statement is needed for this park-recreation system before the National Park Service commits to any boathouse facilities or park designs.

## Environmental issues associated with the site are numerous, and some require more detailed analysis than is appropriate for an Environmental Assessment.

The sampling of citizens from the affected community who had been alerted to, and could attend, the NPS scoping session on January 11 cited issue after issue that raised red flags about the proposed Georgetown University boathouse site. The organizers of the scoping session promised to address all these problems. Here listed are five problem areas that require more intense study than would be expected in an Environmental Assessment:

- 1. The site affects thousands of frequent users of the park and river, yet these citizens did not participate in the site selection. How would the proposed plan affect hikers, cyclists, roller-bladers, fishers, birders, rowers, paddlers, strollers, and other users? Answers to this question will require much careful study.
- 2. The values of the two properties appear so enormously different that an exchange of one for the other is patently a give-away of public property to a private organization. A true assessment of the value of the two properties—one inaccessible and unbuildable, and the other in reach of a public street—is required, and a full investigation of the prior valuation process is called for.
- 3. Many feasible and reasonable sites could be made available to the University for building a boathouse or for conducting their rowing program at shared facilities. The omission of a comprehensive study of alternatives must be corrected. Included in the needed study are two troublesome facets: the do-nothing alternative (which in itself has not been well defined, but needs to be), and how the upstream site and easement could be exchanged for other properties or other types of tenancies that meet the basic requirements of the University's rowing program. Figures 2 and 3 show examples. These are architect's renderings of boathouses suitable for the University's

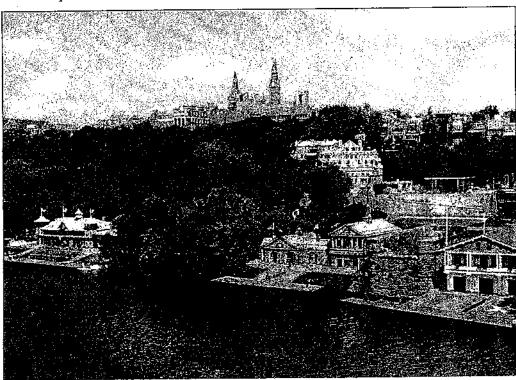


Figure 2. A smaller, but adequate Georgetown University boathouse fits the old Dempsey site between Potomac Boat Club and Washington Canoe Club.

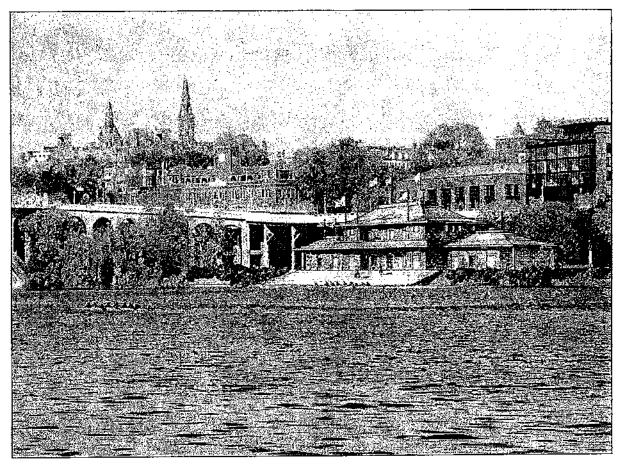
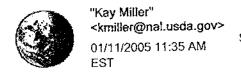


Figure 3. An appropriate site for a Georgetown University boathouse, or similar facilities.

rowing program while at the same time reflecting an accommodation to their particular sites (Figure 2, that of the former Dempsey's Boathouse, and Figure 3 in an area immediately downstream of Key Bridge).

- 4. What would happen to the C&O Canal and Washington Canoe Club during massive floods if the existing hydrological conditions were altered by the presence of the proposed boathouse? Theories exist both alarming and reassuring, but no one knows because there is no adequate, recent study in the public record. A thorough scientific study by qualified engineers is required to determine the dangers of a large building in the proposed location.
- 5. Traffic on the Capital Crescent Trail is high and growing rapidly. At times, intense use already results in interference among the diverse users traveling at different speeds among differing modes of transport. How would the traffic of trucks, cars, long rowing shells, boat trailers, and boathouse visitors be absorbed in the restricted corridor of the trail during training sessions, regattas, and social occasions? This serious problem requires a detailed examination by experts qualified to deal with the complicated statistics and modeling of traffic.



To: <NCR\_Georgetownboathouse@nps.gov>

Subject: Don't do it, please.

I am deeply concerned about a National Park Service (NPS) proposal to swap land within the C&O Canal National Historical Park to Georgetown University for construction of a private boathouse.

I urge you to stop the land swap and request an Environmental Impact Statement to determine whether this action is in the public interest and evaluate the potential impacts of this action.

1) The National Park Service is charged with conserving "the scenery and natural and historic objects and the wild life in the parks and to provide for the enjoyment of same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations."

The proposal threatens, rather than conserves, the park's natural, historic, cultural, recreational, and scenic assets. Removing a large section of those assets from public use sets a disturbing precedent and impairs the enjoyment of future generations.

2) The National Environmental Policy Act calls for the federal government to "attain the widest range of beneficial uses of the environment without degradation," and "preserve important historic, cultural, and natural aspects of our national heritage, and maintain, wherever possible, an environment which supports diversity, and variety of individual choice."

The proposal would instead restrict the uses of the environment; threaten historic, cultural, and natural aspects of our heritage; and limit the diversity of use.

3) The National Environmental Policy Act requires that for "major Federal actions significantly affecting the quality of the human environment, a detailed statement by the responsible official on i) the environmental impact of the proposed action, and ii) any adverse environmental effects which cannot be avoided should the proposal be implemented."

The potential impacts of the NPS proposal include:

An alarming precedent for removing protected parkland from national protection and from public use. Construction activity that would threaten the structural stability of the Potomac River bank and the C&O Canal embankment.

Increased floodwater flow rate due to removal of vegetation, which would threaten the Potomac River bank, the C&O Canal embankment, and the historic Washington Canoe Club and Potomac Boat Club.

Removal of vegetation that provide shade for bikers and hikers; wooded views for bikers, hikers and boaters; and habitat for fish and small mammals.

Hikers, bikers, rollerbladers, and baby strollers would tangle with construction vehicles and later with

large boat trailers at the entrance to the Capital Crescent Trail--a potentially dangerous situation.

4) The National Park Service prepared an Environmental Assessment (EA) on the land swap alone in 1995--nine years ago. The EA is outdated and inadequate. Since then, completion of the Capital Crescent Trail has attracted thousands of users and vegetation and habitat on the proposed boathouse site has increased. The EA did not consider the use of the site for construction of a private boathouse of the size being considered today.

The letter and the spirit of the National Environmental Policy Act call for the federal agency to evaluate the entire proposal, including the ultimate disposition of the public land involved; to consider alternatives to the proposal, including a "no action" alternative; and to do so in a timely manner.

5) Across the Potomac River in Virginia, the National Park Service proposes construction of a public boathouse on national parkland along the Potomac River. In this case, an Environmental Impact Statement process is under way. Why is the NPS carrying out this legal requirement for one national park site but not for another?

I urge you to stop the National Park Service from completing the proposed land swap, and, before any further action is taken, to require an Environmental Impact Statement evaluating all impacts of any land exchange and subsequent construction within the C&O Canal National Historical Park.

Kay Miller

January 16, 2005

Office of Lands, Resources and Planning National Capitol Region National Park Service 1100 Ohio Drive SW Washington, D.C. 20242

Dear Sirs:

Please add my comments to the public record on the Georgetown University Boathouse Environmental Assessment.

As a 40 plus year member of the C&O Canal Association and a member of the Federal Advisory Commission for the C&O Canal NHP for the last 12 years at least, I have the following comments:

Exchanging National Park Service land with a private organization in order for that private organization to build and use a large building within the borders of a National Park sets a very bad precedent.

The value of the land right there in Georgetown, next to Key Bridge, is much greater than the plot up stream near Arizona Avenue. The NPS is making a fiscal mistake.

I have watched the C&O Canal NHP struggle over the years to get rid of structures along the towpath and in the park that are eyesores, obstructions to the viewscape, and that do not meet the requirements of being original to the park. Were there such large boathouses on the Towpath in 1850-1924? With reception rooms? Rowing tanks? I think not

Mary E. Woodward

1393 Steamboat Run Road

Shepherdstown, WV 25443

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# Government of the District of Columbia ADVISORY NEIGHBORHOOD COMMISSION 3-D

P.O. Box 40846 Palisades Station Washington, D.C. 20016

January 19, 2005

Mr. Joe Lawler Regional Director National Capital Region National Park Service 1100 Ohio Drive, SW Washington, DC 20242

ATTN:

Please make this document part of the public record of scoping for the Environmental Assessment for the proposed Georgetown University boathouse.

Dear Mr. Lawler:

On April 7, 2004, Advisory Neighborhood Commission 3D voted unanimously to oppose the proposed transfer of land in the Chesapeake and Ohio Canal National Historic Park to Georgetown University to enable the construction of a private boathouse and to request for a full federal environmental impact study; and, followed up on May 5, 2004 with a letter to Eleanor Holmes Norton. A copy of that letter was sent to Fran Mainella, director of the National Park Service.

Three commissioners in this Advisory Neighborhood Commission (ANC) have segments of the C&O Canal National Historic Park in their Single Member Districts. Collectively, the majority of the historic park in the District of Columbia is within ANC 3D.

Therefore, ANC 3D opposed the transfer of land in the national historic park for the following reasons:

- Only three miles of the C&O Canal National Historic Park (the historic park) are within the District of Columbia, all of which should remain in the public domain for the enjoyment of everyone.
- 2. The land forms part of a busy and narrow public recreational corridor of the historic park, the Potomac Gorge and the Capital Crescent Trail, valued by hikers, bikers, boaters, historians, artists, birders, and others just seeking an outdoor experience. Significant scenic impacts to the Potomac River views from the Towpath, Virginia and Key Bridge would occur if the proposed structure is allowed to be built in the historic park. The proposed private facility would rise above the towpath, dominating the shoreline at the gateway to the park and would be for the exclusive use of a private institution and prohibit use by high school programs and the general public.

- 3. The boathouse would be the first private structure to be built in the historic park since the park was founded. Moreover, the land would be swapped for unbuildable "bottomland" upstream, and would constitute an unequal exchange that is a loss for District residents. Permitting private development in the park now would be setting a precedent for future private development in the historic park.
- 4. Despite the fact that the historic canal bank nearby is fragile and leaking, no engineering analysis has been conducted to determine the impact on the area from the construction of a huge building or its use and maintenance. Furthermore, it is not clear who would pay the costs of repairing the historic canal bank or the historic Washington Canoe Club nearby, nor has consideration been given to the potential impact to public health during and after construction if the corroding 84-inch diameter sewer line which runs through the proposed boathouse site is ever ruptured.
- 5. Although a new access road would be required in order to build and maintain the structure, safety issues have not been addressed. No traffic study has been conducted. Recent disclosure by the District Department of Transportation that it is investigating the deconstruction of Whitehurst Freeway could further impact access to the proposed boathouse site.
- 6. The need to conduct an Environmental Impact Statement (EIS) has been a constant theme expressed throughout this process by many individuals, groups and ANC 3D. The Park Service required an EIS for a boathouse that is proposed for the Arlington County, Virginia shoreline but only required an Environmental Assessment for land in the national historic park.

Better alternatives do exist. The construction of one world class public/private "universal" boathouse, open to everyone, located outside the historic park would be more in the public interest. Moving the proposed boathouse downstream would remove potential impacts to the fragile canal bank, the busy Capital Crescent Trail recreational and commuter corridor as well as potential impacts to the historic Washington Canoe Club. In addition, a public/private boathouse outside the park would protect the park gateway for the use and enjoyment of the public including the scenic views, while providing a boathouse facility for the use of everyone.

Advisory Neighborhood Commission 3D requests that the National Capital Region of the National Park Service undertake the following:

Mr. Joe Lawler January 19, 2005 Page three

- Disclosure of the legal justification for allowing an exclusive structure to be constructed in a national park on land that is significantly more valuable than land that is being swapped for it. A copy of the financial agreement between Georgetown University and the Park Service is requested.
- 2. An EIS of the entire Georgetown non-motorized boathouse zone in the vicinity of Key Bridge to demonstrate the environmental, practical, technical and logistical advantages of moving the proposed location downstream from the currently proposed National Park Service alternative in the national historic park.
- 3. A traffic study of the area including the impacts of constructing a private road to the proposed site.
- An explanation of why the National Park Service, guardian of the parks, is the co-sponsor of a private development project in the Chesapeake and Ohio Canal National Historic Park.
- Make a copy of this letter a part of the public record and that Advisory Neighborhood Commission 3D be given the "great weight" to which it is entitled under District of Columbia law.

Sincerely,

Alma H. Gates

alma H. Gatis

Chair

January 17, 2005

Office of Lands, Resources, and Planning National Capital Region National Park Service 1100 Ohio Drive SW Washington, DC 20242

Re: Environmental Assessment for Georgetown University Boathouse

#### Dear National Park Service:

Here are comments to be considered in conducting your Environmental Assessment of the Georgetown University boathouse:

- 1) Scope Given the level of controversy, complexity of land use, cultural, natural, transportation, and sociological issues, and the size of the overall Georgetown Waterfront Park and boathouse zone, I think it is very important that a full EIS be conducted. From what I have seen of the guidelines from the President's Council on Environmental Quality, this issue easily exceeds the threshold level for deciding to conduct an EIS.
- 2) Land Exchange It is essential that the land exchange be part of the assessment. Many questions have been raised by Defenders of Potomac River Parklands and its member groups about the land exchange. Most prominent for me is whether Georgetown could actually build a boathouse at the upstream site it owns (the site constraints are severe), or is that site merely a bargaining chip? Any assessment should include analysis of Georgetown building the boathouse at the upstream site, and should require that Georgetown demonstrate the feasibility of building at that site. Otherwise the whole rationale for NPS trading away natural park land falls apart, and the entire Georgetown proposal should become moot. In addition, there is a serious question of whether the federal government is getting fair value for this exchange, as is required.
- 3) Recreation As a frequent user of the Capital Crescent Trail (CCT), I am very concerned about the both the bottleneck that the new boathouse will create at the heavily used terminus of the CCT and the impacts on the trail during construction, which will be significant (and probably spread over a year or more) when it seems likely the trail will need to be completely closed for periods of time. What alternatives will be provided for users during those periods? They need to be described. Detailed counts of trails users, at different times of day and in different seasons, should be provided. Similarly, the impacts when Georgetown is holding races need to be detailed: when, how often, what will trail users do when boats are being unloaded, spectators and crews are coming in and out, etc. Also, given Georgetown's reluctance to commit in writing that it will not hold social and alumni events at the boathouse, the frequency and impacts of those events need to be evaluated.

4) River Recreation - The impact of permanent docks on the space for canoeists and rowers needs to be evaluated. It seems likely that the dock design, sticking straight out into the river, will be detrimental to the river use for many other users.

5) Cultural issues – Careful studies of the actual impact of cutting into the C&O Canal bank are needed. Park Service and Georgetown statements that the impacts will be minimal to this important national historical feature are completely unconvincing.

6) Size – The size of the proposed boathouse, with consequent impacts on the environment, is completely unsupportable. The assessment should look at the feasibility of Georgetown building smaller versions that only house facilities that must be river side. Boathouses of 5000-15,000 sq feet might be a place to start.

7) Location – Most people who have looked at the situation find it incomprehensible that the waterfront downstream of Key Bridge is not being seriously considered as the site for this boathouse, and that in fact a boathouse of this size could accommodate many, many more paddlers. Looking at it from the public good point of view, a large "universal" boat house, housing high schools crews (which have an enormous need for space, one which will not be solved by Georgetown moving out of Thompsons) as well as 1—3 university programs, seems far and away the best alternative. The supporters of the totally "natural" Georgetown Waterfront Park will still have 1/3 mile of new natural parkland along the river. This alternative must be looked at in the assessment.

8) Flooding – Little attention seems to have been paid to the impacts of the new boathouse on a site that is subject to frequent floods. What will it do to flood levels on the CCT (an important transportation link for hundreds of commuters each day and a highly popular recreational facility) and at the Washington Canoe Club. Will it change heights? Duration? Scouring, erosion, and other hydraulic effects? Debris accumulation? What will the hydraulic effects be on the embankment of the C&O Canal? Where will additional sedimentation occur as the floods recede and how will this be managed? Given that the boathouse is being built in the riverway and natural flood zone (and Georgetown is not planning to build a new flood control dam upriver, that we know of), detailed hydraulic and hydrologic assessments addressing these issues are needed.

9) Natural areas – The assessment needs to make a convincing statement as to why a private entity should be building a large new structure in dedicated natural national park land, disrupting natural communities and processes, when a very good alternative site, already developed and with much better access for both construction and use, exists less than a quarter mile away.

Thank you for the opportunity to comment.

Sincerely, Prollogin

Mary Rollerson 4515 Q St. NW

Washington, DC 20007



Coalition for the Metropolitan Branch Trail

MBT is a committee of Washington Area Bicyclist Association 733 15th Street, NW Suite 1030 Washington DC 20005

January 19, 2005

Office of Lands, Resources, and Planning National Capital Region National Park Service Washington, DC

Fax - 202-401-0017

Dear Sir/Madam:

As one of the 3 million visitors who enjoy the C&O Canal National Historical Park each year, I am deeply concerned about a proposal to take part of the park for private use. The C&O Canal NHP provides the public with the opportunity to explore the best remaining example of the canals that once were used extensively. The park is also a great place to bird, hike, bike, and watch wildlife.

This proposal jeopardizes those experiences.

In conjunction with the Defenders of the Potomac, the National Parks Conservation Association and the many other preservation and conservation organizations involved in trying to protect this public treasure I would like to add my questions, concerns, and comments for your assessment.

Please include the following as part of the public record for the Environmental Assessment (EA) prepared for the proposed private Georgetown University Boathouse in the C&O Canal NHP:

My questions regarding the proposal include:

- How would the public benefit from the loss of public parkland at the eastern gateway of the C&O Canal National Historical Park for the private use by Georgetown University?
- What precedent would approving this project set for future private development proposals in the Park?
- What would be the impacts on the experience of the park's

approximately 3,000,000 yearly visitors from construction of the structure, and from loss of parkland at the park's eastern gateway? Please include analysis of potential traffic and public safety impacts, especially during construction but also during its operation throughout the year.

- What would be the potential impacts to nearby historic properties including the historic canal? What would be the direct, indirect, and cumulative impacts to the park and nearby historic structures from building a road to access this somewhat inaccessible site for construction, maintenance and servicing of the boathouse, as well as for access of the rowing hulls and boat trailers?
- What would be the direct, indirect, and cumulative impacts to the natural resources, floodplain and wetlands at the site of the proposed boathouse?
- On average, the Potomac River floods every 12 years. What would be the potential impacts on the river including depth, flows, and riverbed contours; potential for riverbed changes due to deposition and scour of sediment and the need for dredging? How would this structure potentially influence potential flood damage to the canal and other park resources?
- What is the value of the national parkland at gateway site relative to land that Georgetown proposes to exchange?

C&O Canal NHP will become more valuable as multi-use public parkland with the passage of time. Proposals to transfer parkland for private use deserve the highest scrutiny. I respectfully request that instead of the limited-scope EA that has been proposed by Park Service, instead the Park Service complete a full Environmental Impact Statement (EIS) for the proposed project.

As a member of the interested public, I do not see any public benefit from the proposal. I fully support leaving the parkland in the park, and encouraging Georgetown University to look elsewhere in the region for an appropriate site.

Sincerely,

Paul H. Meijer

Co-Chairs of the Metropolitan Branch Trail

Paul H. Muse

Please direct correspondence to: P.Meijer 1438 Geranium St. NW , Washington DC 20012

# SHAW 8721 BURNING TREE ROAD BETHESDA, MD 20817

January 20, 2005

Office of Lands, Resources and Planning National Capital Region National Park Service 1100 Ohio Drive SW Washington, DC 20242

## Gentlemen:

I am providing a written statement which I request be made part of the record in the preparation of an Environmental Assessment for the proposed Georgetown University Boathouse. I wish to note at the outset that it is my opinion that rather than an Environmental Assessment, this project requires the preparation of a full Environmental Impact Statement. The issues that need to be resolved are too important for a limited Environmental Assessment.

As proposed, the Boathouse will have a detrimental effect on scenic, historic and recreational aspects of the C & O Canal National Historic Park. The intrusiveness of this large boathouse would not only block a view of the Potomac River from the canal towpath, but access to the building would create an unacceptable choke point along the Capital Crescent Trail, which runs below the towpath. There would certainly be safety issues involved. How would rowing hulls on long trailers enter and exit the site without tangling with other traffic? The boathouse would be constructed near a corroding 84-inch sewer line that runs from Virginia, Maryland and DC, risking damage to the line. How will surrounding wetlands and floodplains be effected by the construction of the boathouse? At a minimum, an engineering and traffic analysis of the boathouse site and the surrounding area must be undertaken. An analysis by an architectural historian is also warranted.

The C&O Canal is a national treasure and the building of such a large structure, 33,000 square feet of floor space with a 75 foot dock extending into the Potomac River, not to mention the height of the building, requires that potential alternatives be considered and explored.

Sincerely,
Helen L. Shaw

Post-It® Fax Note 767:	Date # of ▶
TO NPS	From Helen SHAW
Co/Dept	Co.
Phone #	Phone # 361-345-1933
Fex # 1 401 001	7 Fax #

# Edmund (Ned) Preston 6306 Swords Way, Bethesda, MD 20817 301-530-8153; presto77@verizon.net

January 17, 2005

Office of Lands, Resources and Planning National Capital Region National Park Service 1100 Ohio Drive, SW. Washington, DC 20242

NCR Georgetownboathouse@nps.gov

Dear Sir or Madam:

Below are my comments on the Proposed Georgetown University Boathouse Environmental Assessment. Please include them in the public record of that study.

The Proposed Site: I consider the proposed boathouse site to be wholly unacceptable because it seriously degrades the historical value and natural beauty of the C&O Canal National Historic Park. The project would mean the loss of a section of wooded shoreline that is part of the distinctive charm of the park, which brings a corridor of wilderness into to an urban setting. For those using the towpath, the structure would block a view of trees and the river, confronting them instead with the rear of a modern building. Users of the Capital Crescent Trail would be forced to proceed along a very narrow, congested route between the boathouse and the embankment that supports the towpath. A private institution should not be allowed to establish a facility for its own exclusive use on parkland property that is part of our national patrimony. In my opinion, these reasons alone are sufficient to reject the proposed building.

The Land Exchange: The boathouse proposal is based on the National Park Service's exchange of the site for an upstream property owned by Georgetown University. Having visited this GU property, I conclude that it is not a practical building site, and that it has little or no value apart from its current de facto function as a part of the park scenery. Such an exchange cannot possibly represent an equal trade, and it is definitely not in the public interest.

The Building's Size: The dimensions of the proposed building are much larger than are reasonably required for GU's rowing team, and include space for exercising and for gatherings that could be located elsewhere. It is also out of proportion with the adjacent Washington Canoe Club, an historic structure. The excessive size of the proposed boathouse makes it especially undesirable; however, I wish to stress that to permit a smaller building on this site would not be a viable compromise, since the location itself is unacceptable.

Need for an EIS: The boathouse proposal involves major, permanent changes to a beautiful and historic area that is greatly valued by local residents and visitors to the nation's capital. The issue is both complex and highly important, and hence it clearly demands preparation of an Environmental Impact Statement, not merely an Environmental Assessment.

Alternative Sites: I believe that the study should include detailed consideration of alternative sites for the GU boathouse. In my opinion, viable options exist downriver from the ruins of the Alexandria Aqueduct – however, I wish to emphasize that the presently proposed site would be unacceptable even if no alternative sites were available. The university's desire for a boathouse near its campus is an understandable goal, but it cannot be allowed to override the public interest.

I very much appreciate the opportunity to contribute my comments to this assessment.

Sincerely,

Edmund Preston

God Preston

# **FAX TRANSMISSION**

DATE: Jan. 18, 2005

## FROM:

Edmund (Ned) Preston 6306 Swords Way, Bethesda, MD 20817 301-530-8153; presto77@verizon.net

### TO:

Office of Lands, Resources and Planning National Capital Region National Park Service 1100 Ohio Drive, SW, Washington, DC 20242 FAX: 202-401-0017

#### MESSAGE:

Attached are comments on the Proposed Georgetown University Boathouse Environmental Assessment for inclusion in the public record of that assessment. I submitted a duplicate of this document by e-mail yesterday, but am forwarding the attached as a backup.

Thank you for your attention.

THIS COVER SHEET IS PAGE 1 of 2 PAGES

# National Parks Conservation Association

Protecting Parks for Future Generations

January 21, 2005

Office of Lands, Resources, and Planning National Capital Region, NPS Washington, DC

Hmail: NCR Georgetownboathouse@nps.gov and Fax - 202-401-0017

Dear Sir/Madam:

The following comments are submitted on behalf of the nonpartisan National Parks Conservation Association (NPCA) and our 300,000 members nationwide. Please add our comments to the public record. NPCA opposes Georgetown University's proposal to take established parkland at the eastern gateway of the C&O Canal National Historical Park (NHP) for a private clubhouse.

The C&O Canal NHP provides the public with a priceless opportunity to explore the best remaining example of the canals that once were used extensively to move goods between what was then the western frontier and the established communities along the Eastern scaboard. The park protects thousands of years of human history, from pre-colonial American Indian sites to Civilian Conservation Corps campgrounds. C&O Canal NHP is home to more than 200 federal and state rare, threatened, and endangered species. C&O Canal provides necessary recreational open space, and is a popular place to bird, hike, bike, and watch wildlife. This proposed private clubhouse jeopardizes those experiences and those resources. With careful stewardship, C&O Canal NHP will become even more valuable as multi-use public parkland with the passage of time.

The potential impacts on the historic park resources and on the experience of the park's approximately 3 million annual visitots from construction and operation of this proposed clubhouse deserve thorough analysis in a full Environmental Impact Statement (EIS). The apparent support that representatives of the National Park Service (NPS) have expressed for limiting review to an Environmental Assessment (EA) is ill-advised.

The National Environmental Policy Act requires an EIS when a federal action would have "significant impact on the human environment" (NPS Director's Order #12). There is no question that the proposed development would have "significant" impacts. An EA is too limited in its scope to adequately consider the project's impacts. The NPS is appropriately performing an EIS, not an EA, for a proposed boathouse along the Potomac shoreline in Virginia, for example.

Answering the following questions would be very helpful to the NPS and to the public in weighing this proposal:

- How would the public benefit from the loss of public patkland at the eastern gateway of the C&O Canal National Historical Park for the private use by Georgetown University? No public benefits are apparent to the concerned public. The potential public benefits of trading land Georgetown owns upstream for the parkland near the park's eastern gateway would not offset the public's losses.



1300 19th Street, N.W., Washington, D.C. 20036 Telephone (202) 223-NPCA (6722) • Fax (202) 659-0650

- What precedent would approving this project set for future private development proposals in the park? The park stretches 184 miles, with numerous adjacent landowners. The potential for requests to use the public's resources for private purposes is limitless.
- What would be the impacts on the experience of the park's approximately 3 million yearly visitors from construction of the structure, and from loss of parkland at the park's eastern gateway? Please include analysis of potential traffic and public safety impacts, especially during construction but also during its operation throughout the year.
- What would be the potential impacts to nearby historic properties including the historic canal? What would be the direct, indirect, and cumulative impacts to the park and nearby historic structures from building a road to access this somewhat inaccessible site for construction, maintenance and servicing of the boathouse, as well as for access of the rowing hulls and boat trailers?
- What would be the direct, indirect, and cumulative impacts to the natural resources, floodplain and wetlands at the site of the proposed boathouse?
- On average, the Potomac River floods every 12 years. What would be the potential impacts on the river including depth, flows, and riverbed contours; potential for riverbed changes due to deposition and scour of sediment and the need for dredging? How would this structure potentially influence potential flood damage to the canal structures and other park resources?
- What is the value of the national parkland at gateway site relative to land that Georgetown proposes to exchange?

NPCA strongly urges the NPS to thoroughly analyze this and other proposed waterfront developments that would potentially impact national parkland in the National Capital Region. Reasonable alternatives may exist to the Georgetown University proposal. The Potomac River waterfront is a priceless national and local public resource, requiring thoughtful and thorough analysis. Development of an EIS is integral to good decision-making.

Thank you for considering our comments.

Sincerely,

Joy M. Gakes, Director Mid-Atlantic Region



John P. Helm 5406 Cromwell Drive Bethesda, Maryland 20816 January 17, 2005

Mr. Joe Lawler Regional Director, National Capital Region National Park Service 1100 Ohio Drive SW Washington, DC 20242

Dear Mr. Lawler:

10 LOG NO. 1 24 - (1)

I am writing regarding my concerns about the construction of the proposed Georgetown University Boathouse within the C&O Canal National Historical Park.

Clearly this is a project that is inappropriate for a site within the C&O Canal National Historical Park. The size, design, location and impact are unconscionable. In addition, the process of swapping land, in a prime urban location, with other less valuable land upstream requires scrutiny and review. Here are my concerns regarding this construction and its impact:

- The view shed is adversely impacted: the beautiful vista of the Potomac north of Key Bridge is a wonderful part of the Washington, DC natural landscape
- No demonstration of the impact of Potomac River flooding on the surrounding areas including the fragile walls of the canal itself and the historic Washington Canoe Club nearby
- Construction, excavation and equipment threaten the fragile walls of the Canal, the historic Washington Canoe Club, and the use of the extremely popular and well used Crescent Trail
- Construction directly impacts natural resources, flood plane, and wetlands at the site of the boathouse
- The sheer amount of vehicular traffic to the boathouse, especially at times of competitions, with long trailers, cars, and trucks has not been adequately assessed but is certain to impact public access to the Crescent Trail and endanger citizen users
- The private dock, estimated to extend 75 feet into the Potomac River, will impact recreational river users and fishermen. The impact on spawning fish going upstream in the spring has not even been touched upon
- The proposed boathouse and dock construction may interfere with river flows including depth and riverbed contours - perhaps with unexpected results
- An assessment to the potential impact of this construction on public health must be developed due to its close proximity to the 84" sewer line that runs through the proposed boathouse site
- The sheer magnitude of the space encompassed by the boathouse needs to be assessed in terms of the of Georgetown University boats that will be removed from Thompson's Boathouse - is this new boathouse out of proportion to the need to accommodate these boats
- Impact of light and noise, in this natural park setting, during and after hours of operation of the boathouse will this become a party setting within the C&O National Historical Park

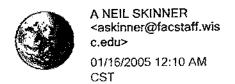
# My suggestions for alternatives:

- Consider building a smaller, more reasonably sized, facility outside of our beloved C&O Canal National Historical Park, to preserve its character for generations to come
- Instead of a limited scope environmental assessment as proposed by NPS, an Environmental Impact Statement (EIS) of the entire Georgetown non-motorized boathouse zone, between 34th Street NW and Key Bridge should be completed

Thank you for your consideration.

Sincerely, Cel-Helm

John P. Helm



To: NCR\_Georgetownboathouse@nps.gov

CC:

Subject: Proposed Georgetown University Boathouse

Office of Lands, Resources and Planning, January 15, 2005

National Capital Region,

National Park Service, 1100 Ohio Drive, SW,

Washington, DC 20242

To Whom It May Concern:

I am writing to express my dismay at the size and location of the Proposed Georgetown University Boathouse, intruding on National Historical Parkland of the C&O Canal Towpath.

Even though I am writing from Wisconsin, and as such, am only an occasional visitor to the C&OCNHP, I feel I have a vested interest in perserving the scenic, historic and recreational value of the entire towpath. My father, Warren F. Gardner, then a Connecticut newspaper editor, accompanied Justice William O. Douglas for 168 miles of the 1954 hike which led to the towpath's designation as a national historical park some years later. He attended several reunion hikes, and was a founding member of the C&O Canal Association. Last spring, my two brothers, David Gardner (of Beverly MA) and Robert Gardner (of Newtown CT), their wives, and a cousin, Anne Jafferis (of New Haven CT) gathered from three states to walk the last few miles of the towpath into Georgetown, in memory of our father, who died in 2003 at age 93. It was then that we first learned of the plans to obscure the view of the Potomac f rom the trail; those in opposition had indicated with marking tape the proposed height of the boathouse, which seemed entirely out of proportion to the surrounding area.

I should say parenthetically that I am not averse to the idea of a boathouse in a more appropriate location, not using public parkland. My son was an All American rower at Wesleyan University, and has competed with Georgetown rowers at Nationals. I have first hand experience with driving rowing shells to regattas, and so have some sense of the turnaround and off-loading space required for trailers.

It would seem to me at the very least, a full Environmental Impact Statement, including an engineering and traffic analysis, and an architectural historian's analysis. From what I saw of the proposed site last spring, I cannot imagine how they could construct a building of that size on public land without seriously compromising the canal berm and area wetlands, the sewer line that

services Virginia, Maryland and DC, and the Capital Crescent Trail. Aesthetically, a 300 foot long building obsuring views of the Potomac would be a disaster for towpath users. How can the fill required to provide adequate turnaround and parking space for trailors carrying rowing shells not impact the Capital Crescent Trail and the C&OCNHP?

A location downstream, more readily accessible to students who will use the tank and ergs, that did not carve away precious National Historical Parkland, would, in my view, be much more desirable. Please do a complete Environmental Impact Statement for this major project with far-reaching implications for the scenic, historic, and recreational value of the surrounding area.

I fear Justice William O. Douglas, and my father are turning over in their graves at the prospect of this intrusion into the park they helped to create by their historic walk in 1954. Please give them, and all users of the C&OCNHP some peace by blocking this behemoth boathouse!

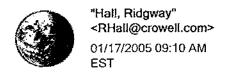
Sincerely yours,

Margaret Gardner Skinner

2215 Eton Ridge

Madison, WI 53726

askinner@wisc.edu



To: <NCR\_Georgetownboathouse@nps.gov>

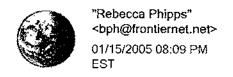
Subject: Proposed Georgetown Boathouse

Dear Sir or Madam: For over 25 years my family has used the C&O Towpath for hiking and biking, and we plan to continue to do so. The proposal to allow Georgetown University to build a large boathouse near the Key Bridge is inconsistent with, and would significantly disrupt, the present appearance, aesthetics and recreational uses of this area. We urge you to require a full-scale EIS for this project. Furthermore, on the merits, we urge that the proposed boathouse not be built at this location (the Anacostia provides a much larger area and would be more appropriate) or that, if it is to be built at this location, the building be no larger than those of the Potomac Boat Club or Washington Canoe Club currrently sited in that area.

Thanks for your consideration

Ridgway M. Hall and family 3500 Ordway Street, N. W, Washington, DC 20016

1-17-05



To: <NCR\_Georgetownboathouse@nps.gov>

. . CC.

Subject: Please don't set this elitist and dangerous in general precedent

### Dear NPS:

Please include the following "issues and alternatives" as part of the Environmental Assessment (EA) for the proposed private Georgetown University Boathouse in the C&O Canal National Historical Park:

### I. ISSUES:

- The use of a section of the C&O Canal National Park for private development and the setting of a precedent for future private development in the Park;
- Significant impacts to the scenic Potomac River views from the Towpath, Virginia, Key Bridge and the River, from the construction of the enormous boathouse (the length of a football field and 50 feet high);
- Potential impacts to nearby historic properties (Washington Canoe Club, Canal embankment);
- Safety at the busy, narrow, fragile recreational and commuter corridor at the gateway entrance to the Park and the Capital Crescent Trail (CCT);
- Direct and indirect impacts to the natural resources, floodplain and wetlands at the site of the proposed boathouse;
- Potential impacts to public health during and after construction of the boathouse (if the corroding 84-inch diameter sewer line which runs through the proposed boathouse site is ever ruptured);
- Significant impacts to Park and nearby historic structures from building a private road to access the (inaccessible) site for construction, maintenance and servicing of the boathouse, as well as for access of the rowing hulls and boat trailers;
- River flows including depth, flows, and riverbed contours; potential for riverbed changes due to deposition and scour of sediment and the need for dredging.
- Size, design, location and use of the proposed collegiate boathouse;
- Cumulative impacts from the construction of three proposed boathouses in the vicinity of Key Bridge (two private university boathouses and one public boathouse) as well as a fourth boathouse on the Virginia shore;
- Impact on the pedestrian and vehicular traffic in an already constricted space with no parking at the site;
- Value of national parkland at gateway site relative to land owned by GU proposed for land exchange, and legality of such an exchange;
- Impact from utilities (underground, above ground) and effects from lights and noise before, during and after hours of operation of the boathouse;
- Effect on shoreline boaters from 75-foot private dock extending out into river;
- Hydrological issues related to the floodplain/runoff related to the development and effect of the boathouse on downstream structures;

- Waterfront issues related to the goals and objectives of the DC Comprehensive Plan.
- Direct and indirect impacts to the non-motorized boathouse zone for the Georgetown Waterfront Park if the Whitehurst Freeway is demolished.

Among the many "alternatives" that should be considered in the EA are two environmentally friendly plans:

### II. ALTERNATIVES:

- Alternative A: Consider building a collegiate facility smaller than the one proposed, outside the Park and immediately downstream of the Washington Canoe Club, at the old Dempsey boathouse site;
- Alternative B: Instead of three separate boathouses, consider building only one public-private facility (a Georgetown "Universal" Boathouse), outside the C&O Park, between 34th St. and Key Bridge, and open to university, high school and public boating programs, like Thompson's Boathouse at the south end of Georgetown. (A sketch of Alternative A and B are available at <a href="www.savethecanal.org">www.savethecanal.org</a>, under "Alternatives."
- (Consider other alternatives outside the Georgetown non-motorized boathouse zone, including redevelopment of existing Thompson's, and other sites along the Potomac, Anacostia and Virginia shorelines, as well as no action.)

# III. ADVANTAGES OF THE ABOVE-MENTIONED "ALTERNATIVES" OVER THE NPS-ALTERNATIVE IN THE C&O PARK:

- Protection of undeveloped national parkland from private development;
- Preservation of green open space along a tidal floodplain for future generations (while redeveloping already paved land);
- Elimination of the need for a private access road to the proposed site;
- Easy access for construction, maintenance and servicing of the boathouse, as well as for access of rowing hulls and boat trailers (especially true for Alternative B);
- Safer location, less congested traffic since sites are farther from busy entrance to the Park and CCT (especially true for Alternative B);
- Near public parking;
- Available to both public and private boating interests (only true for Alternative B);
- Away from historic properties (only true for Alternative B);
- Opportunity to develop one world class facility for the use of all boating interests, including high school boaters (only true for Alternative B).

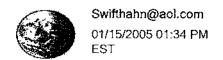
Instead of the limited-scope EA that has been proposed by NPS, an Environmental Impact Statement (EIS) of the entire Georgetown non-motorized boathouse zone, between 34th St. and Key Bridge, should be done. An EIS would demonstrate the environmental, practical, technical and logistical advantages of moving the proposed location downstream from the currently proposed NPS alternative in the Park. An environmental analysis, as well as cost-benefit, engineering, viewshed and traffic studies of the zone should be included in the EIS, and a draft version of the report made available to the public for comments. (Note - NPS is already in the

process of doing an EIS to identify a site for just one boathouse for the Arlington County, Virginia, shoreline, but has not yet considered doing an EIS for the Georgetown boathouse zone, where three proposed boathouses are contemplated!)

And lastly.

If this goes through, could a similar arrangement be far behind for our beloved C&O Canal towpath out here in WVa? Please reconsider, it would be such a wrongheaded step for NPS to take.

Sincerely, Rebecca Phipps bph@frontiernet.net P.O. Box 845 Shepherdstown, WV 25443 Jan. 15, 2005



To: NCR\_Georgetownboathouse@nps.gov

Subject: Proposed Georgetown University Boathouse on the Chesapeake & Ohio Canal

I am opposed to the proposed boathouse by Georgetown University within land presently owned by the National Park Service in the Georgetown Area. It would completely change the ambiance of the area and the historical emphasis of the park. For three years my family and I lived in a lockhouse (Lock House No. 6 at Brookmont) and I believe that I have a feeling for the canal and the Potomac Riverriver.

I completely agree with the attitude of many others that the building of the boat house would harm the scenic, historic, and recreational value of the site and its surroundings; the structure is far larger than any reasonable requirement; its construction would block a view of the river from the towpath; access to the building would create an unacceptable choke point along the Capital Crescent Trail, which runs below the towpath; the land exchange on which the project is based is not fair or appropriate; and that the proposed boathouse would represent unwarranted use of public land for private purposes. COCA believes that the issue requires preparation of a full Environmental Impact Statement, rather than merely an Environmental Assessment, and that alternative sites must be considered in the study. I agree with that stand.

I have had the following experience regarding canals and the environment:

Superintendent, The Restored Portion, Chesapeake & Ohio Canal

Industrial Archaeologist, National Park Service Denver Service Center Research Team for the Restoration of the C & O Canal (Co-author, Industrial Archaeology of the Chesapeake & Ohio Canal and Industrial Archaeology of the Potomac Canal)

West Virginia Commissioner, Department of Interior Chesapeake & Ohio Canal Citizen's Advisory Commission

Founder and Founding President, American Canal Society

Editor, American Canals (The Publication of the American Canal Society)

A National Director of the American Canal Society for the past 32 years

Editor, Along the Towpath (The Publication of the Chesapeake & Ohio Canal Association

Chairman of the Level Walkers, C & O Canal Association

Founder and Founding President, International Canal Society

American Correspondent, Waterways World (UK)

Owner/Director, Waterways Bookshops, Ltd. (UK)

Advisor, British Waterways Board

Professional Industrial Archaeologist specializing in historic canals

Owner, American Canal Center (ACS)

Director, North American Canal Research Program (NOCRAP)

Co-Owner, American Canal & Transportation Center (Publishers)

Adjunct Professor, Institute for the History of Technology & Industrial Archaeology, West Virginia University)

Author or co-author of many canal works, including books canals in the Washington area: The Towpath Guide to the C & O Canal, The Chesapeake & Ohio Canal Boatmen, Life on the

Chesapeake & Ohio Canal ), The Chesapeake & Ohio Canal: Pathway to the Nation's Capitol: An Illustrated History of the Chesapeake & Ohio Canal ; The Chesapeake & Ohio Canal Old Picture Album; Canal Boat Children; The Alexandria Canal: Its History & Preservation; Cement Mills Along the Potomac River; The Maritime History of Alexandria, Virginia (unpublished)



To: <NCR\_Georgetownboathouse@nps.gov> cc: Subject:

01/15/2005 05:40 PM EST

Mr. Joe Lawler

Regional Director, National Capital Region

National Park Service

1100 Ohio Drive, SW

Washington, DC 20242

FAX-(202) 401-0017

Email - NCR Georgetownboathouse@nps.gov

Dear Mr. Lawler:

Please include the following "issues and alternatives" as part of the Environmental Assessment (EA) for the proposed private Georgetown University Boathouse in the C&O Canal National Historical Park:

#### I. ISSUES:

- The use of a section of the C&O Canal National Park for private development and the setting of a precedent for future private development in the Park;
- Significant impacts to the scenic Potomac River views from the Towpath, Virginia, Key Bridge and the River, from the construction of the enormous boathouse (the length of a football field and 50 feet high);
- Potential impacts to nearby historic properties (Washington Canoe Club, Canal embankment);
- Safety at the busy, narrow, fragile recreational and commuter corridor at the gateway entrance to the Park and the Capital Crescent Trail (CCT);
- Direct and indirect impacts to the natural resources, floodplain and wetlands at the site of the proposed boathouse;
- Potential impacts to public health during and after construction of

the boathouse (if the corroding 84-inch diameter sewer line which runs through the proposed boathouse site is ever ruptured);

- Significant impacts to Park and nearby historic structures from building a private road to access the (inaccessible) site for construction, maintenance and servicing of the boathouse, as well as for access of the rowing hulls and boat trailers;
- River flows including depth, flows, and riverbed contours; potential for riverbed changes due to deposition and scour of sediment and the need for dredging.
- Size, design, location and use of the proposed collegiate boathouse;
- Cumulative impacts from the construction of three proposed boathouses in the vicinity of Key Bridge (two private university boathouses and one public boathouse);
- Impact on the pedestrian and vehicular traffic in an already constricted space with no parking at the site;
- Value of national parkland at gateway site relative to land owned by GU proposed for land exchange, and legality of such an exchange;
- Impact from utilities (underground, above ground) and effects from lights and noise before, during and after hours of operation of the boathouse;
- Effect on shoreline boaters from 75-foot private dock extending out into river;
- Hydrological issues related to the floodplain/runoff related to the development and effect of the boathouse on downstream structures;
- Waterfront issues related to the goals and objectives of the DC Comprehensive Plan.
- Direct and indirect impacts to the non-motorized boathouse zone for the Georgetown Waterfront Park if the Whitehurst Freeway is demolished.

Among the many "alternatives" that should be considered in the EA are two environmentally friendly plans:

#### II. ALTERNATIVES:

- Alternative A: Consider building a collegiate facility smaller than the one proposed, outside the Park and immediately downstream of the Washington Canoe Club, at the old Dempsey boathouse site;
- Alternative B: Instead of three separate boathouses, consider building only one public-private facility, outside the Park, between 34th St. and Key Bridge and open to university, high school and public boating programs, like Thompson's Boathouse at the south end of Georgetown. (A sketch of Alternative A and B are available at

www.savethecanal.org, under "Alternatives."

- (Consider other alternatives outside the Georgetown non-motorized boathouse zone, including redevelopment of existing Thompson's, and other sites along the Potomac, Anacostia and Virginia shorelines.)
- III. ADVANTAGES OF THE ABOVE-MENTIONED "ALTERNATIVES" OVER THE NPS-ALTERNATIVE IN THE PARK:
- Protection of undeveloped national parkland from private development;
- Preservation of green open space along a tidal floodplain for future generations (while redeveloping already paved land);
- Elimination of the need for a private access road to the proposed site;
- Easy access for construction, maintenance and servicing of the boathouse, as well as for access of rowing hulls and boat trailers (especially true for Alternative B);
- Safer location, less congested traffic since sites are farther from busy entrance to the Park and CCT (especially true for Alternative B);
- Near public parking;
- Available to both public and private boating interests (only true for Alternative B);
- Away from historic properties (only true for Alternative B);
- Opportunity to develop one world class facility for the use of all boating interests (only true for Alternative B).

Instead of the limited-scope EA that has been proposed by NPS, an Environmental Impact Statement (EIS) of the entire Georgetown non-motorized boathouse zone, between 34th St. and Key Bridge, should be done. An EIS would demonstrate the environmental, practical, technical and logistical advantages of moving the proposed location downstream from the currently proposed NPS alternative in the Park. An environmental analysis, as well as cost-benefit, engineering, viewshed and traffic studies of the zone should be included in the EIS, and a draft version of the report made available to the public for comments. (Note - NPS is already in the process of doing an EIS to identify a site for just one boathouse for the Arlington County, Virginia, shoreline, but has not yet considered doing an EIS for the Georgetown boathouse zone, where three proposed boathouses are contemplated!)

Dear Mr. Lawler,

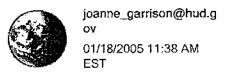
I was present at the 11 January 2005 scoping meeting at Table #2. I just want to make a few additional observations which I have been thinking about since the meeting.

The vast majority of the comments from all the tables were really related to the question of the LOCATION of the proposed Boathouse. The choice of this location is what has created the natural resources, flood plain, wetlands, views/vistas, and historic surroundings issues which you catalogued in your written introduction handed out at the meeting. A location to the east of Key Bridge would have eliminated or certainly reduced these problem issues. I have to wonder how the idea for using this location came about. Whoever sold Georgetown University and/or the Park Service on it has done them both a disservice, because to try to solve these problem issues, including also the need to construct a building on top of the connector sewer, will increase construction costs over and above what a facility would cost east of Key Bridge. As an architect, I cannot understand how the university and the Park Service could have gotten themselves this deeply into the project without being restrained by the realities of the site. The EA should address the history of this site selection.

The second-most important issue is the proposed SIZE (including height) of the Boathouse. As I understand it, an architectural space program and preliminary plans based on that program have been drawn up. The results were posted on the walls. The architect was not identified at the meeting and was not part of the proceedings. How will EDAW, a good land planner with whom I have worked before, address the architectural issues without making the architect a part of the EA team? Building programs and designs must respond to their specific sites. If the EA addresses alternative sites, how will it handle the architectural issues which are likely to suggest somewhat different architectural approaches to each site?

A third point is that these issues are becoming so complex and controversial that an EIS is really needed, not just an EA.

Yours sincerely, Donald W. Velsey, AIA



To: NCR\_Georgetownboathouse@nps.gov cc: aljones101@juno.com

Subject: comments on Georgetown Boathouse

Director, Office of Lands, Resources and Planning National Capital Region National Park Service 1100 Ohio Drive, SW Washington, DC 20242 FAX-(202) 401-0017 Email - NCR Georgetownboathouse@nps.gov

#### Dear NPS:

I am writing to object to the proposal to build a massive, private recreational facility for Georgetown University's exclusive use on the Potomac River, inside C&O Canal National Park. This facility will destroy habitat, relocate the Capital Crescent Trail, threaten the C&O canal and historic structures during floods, and change the view forever.

I recommend the following alternatives be considered:

- Alternative A: Consider building a collegiate facility smaller than the one proposed, outside the Park and immediately downstream of the Washington Canoe Club, at the old Dempsey boathouse site;
- Alternative B: Instead of three separate boathouses, consider building only one public-private facility (a Georgetown "Universal"

Boathouse), outside the C&O Park, between 34th St. and Key Bridge, and open to university, high school and public boating programs, to supplement Thompson's Boathouse at the south end of Georgetown. (A sketch of Alternative A and B are available at www.savethecanal.org, under "Alternatives."

- Consider other alternatives outside the Georgetown non-motorized boathouse zone, including redevelopment of existing Thompson's, and other sites along the Potomac, Anacostia and Virginia shorelines.
- Consider no-action alternative of not building any boathouse at the proposed site as well as alternative of not building any boathouses within C&O Canal National Park.

The Environmental Assessment (EA) for the proposed private Georgetown University Boathouse in the C&O Canal National Historical Park should include the following issues (and the alternatives listed above):

#### I. ISSUES AND IMPACTS:

- The use of a section of the C&O Canal National Park, designated as a public resource, for private development and the precedent this sets for future private development in this Park and other national parks;
- Significant impacts to the scenic Potomac River views from the Towpath, Virginia, Key Bridge and the River, from the construction of the enormous boathouse (the length of a football field and 50 feet high);
- Potential impacts to nearby historic properties (Washington Canoe Club, Canal embankment) from digging for foundation and utilities, heavy construction traffic, safety of people lduring construction and use;
- Safety of hikers, bikers, baby strollers, rollerbladers when they encounter construction equipment and large boat trailers at the narrow recreational and commuter corridor at the entrance to the Park and the Capital Crescent Trail (CCT);
- Direct and indirect impacts to the natural resources, habitat, floodplain and wetlands at the site of the proposed boathouse;
- Potential impacts to public health during and after construction of the boathouse due to potential disturbance or rupture of 84-inch diameter sewer line which runs through the proposed boathouse site;
- Environmental impacts to Park and nearby historic structures and safety of users of those facilities from building a private road to access the propsed site for construction, maintenance and servicing of the boathouse, as well as for access of the rowing hulls and boat trailers;
- River flows, including depth, flows, and riverbed contours; potential for riverbed changes due to deposition and scour of sediment and the need for dredging;
- Justification for enormous size, design, location and exclusive use of the proposed collegiate boathouse;
- Impact on the pedestrian and vehicular traffic in an already constricted space with no parking at the site;
- Impact on parking along K Street;
- Safety, visual, and restricted usage impacts on recreational boaters hugging the shoreline from a 75-foot private dock extending out into river;
- Hydrological and water quality impacts of changing the topography and vegetation of the floodplain and from increased runoff from construction and operation of the boathouse, including flooding effects on downstream river users and shoreline structures;
- Impact from utilities (underground, above ground) and effects from lights and noise before, during and after hours of operation of the boathouse;
- Value of national parkland at proposed gateway site relative to

land owned by GU proposed for land exchange, and legality of such an exchange;

- Impact on goals and objectives of the DC Comprehensive Plan;
- Cumulative impacts to human and natural environment, including safety for shore and river users, river flows, flooding, erosion and sediment deposition, fish and wildlife habitat removal, and other environmental degradation from the construction of three proposed boathouses in the vicinity of Key Bridge (two private university boathouses and one public boathouse) as well as a fourth boathouse on the Virginia shore;
- Direct and indirect impacts to the non-motorized boathouse zone and the Georgetown Waterfront Park if the Whitehurst Freeway is demolished.

Among the many "alternatives" that should be considered in the EA are two environmentally friendly plans:

#### II. ALTERNATIVES:

- Alternative A: Consider building a collegiate facility smaller than the one proposed, outside the Park and immediately downstream of the Washington Canoe Club, at the old Dempsey boathouse site;
- Alternative B: Instead of three separate boathouses, consider building only one public-private facility (a Georgetown "Universal"

Boathouse), outside the C&O Park, between 34th St. and Key Bridge, and open to university, high school and public boating programs, to supplement Thompson's Boathouse at the south end of Georgetown. (A sketch of Alternative A and B are available at www.savethecanal.org, under "Alternatives."

- Consider other alternatives outside the Georgetown non-motorized boathouse zone, including redevelopment of existing Thompson's, and other sites along the Potomac, Anacostia and Virginia shorelines.
- Consider no-action alternative of not building any boathouse at the proposed site as well as alternative of not building any boathouses within C&O Canal National Park.
- III. ADVANTAGES OF THE ABOVE-MENTIONED "ALTERNATIVES" OVER THE NPS-ALTERNATIVE IN THE C&O PARK:
- Protection of currently undeveloped national parkland from private development in favor of using already degraded paved areas within the non-motorized boathouse zone for boathouses;
   Preservation of green open space along a tidal floodplain
- Preservation of green open space along a tidal floodplain (while redeveloping already paved land);
- Elimination of the need for a private access road to the

proposed site;

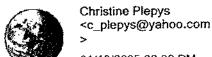
- Easier access for Georgetown University's users and visitors because of closer location to bridge across C&O Canal;
- Closer to public parking for users and visitors;
- Easy access for construction, maintenance and servicing of the boathouse, as well as for access of rowing hulls and boat trailers (especially true for Alternative B);
- Safer location, less congested traffic since sites are farther from busy entrance to the Park and commuter corridor along CCT (especially true for Alternative B);
- Available to both public and private boating interests (only true for Alternative B);
- Away from historic properties (only true for Alternative B);
- Opportunity to develop one world-class facility for the use of all boating interests, including high school boaters (only true for Alternative B).

Instead of the limited-scope EA that has been proposed by NPS, an Environmental Impact Statement (EIS) of the entire Georgetown non-motorized boathouse zone, between 34th St. and Key Bridge, should be done. An EIS would demonstrate the environmental, practical, technical and logistical advantages of moving the proposed location downstream from the currently proposed NPS alternative in the Park. An environmental analysis, as well as cost-benefit, engineering, viewshed and traffic studies of the zone should be included in the EIS, and a draft version of the report made available to the public for comments.

Note - NPS is already in the process of doing an EIS to identify a site for just one boathouse for the Arlington County, Virginia, shoreline, but has not yet considered doing an EIS for the Georgetown boathouse zone, where three proposed boathouses are contemplated. CEQ requires consideration of precedents in other national parks.

Sincerely,

Jo Anne Garrison jofannie@cavtel.net 2803



01/18/2005 02:38 PM PST To: NCR\_Georgetownboathouse@nps.gov

CC:

Subject: Georgetown University proposal

#### Dear Sir/Madam:

I frequently visit the C&O canal and have ridden all 180 miles on my bike. It is one of the best places in Washington, DC, used extensively by many people - to exercise, bird, hike, bike, and watch wildlife. It's a quick respite from the mayhem of the Georgetown rea. This proposal jeopardizes those experiences.

In conjunction with the Defenders of the Potomac, the National Parks Conservation Association and the many other preservation and conservation organizations involved in trying to protect this public treasure I would like to add my questions, concerns, and comments for your assessment. Please include the following as part of the public record for the Environmental Assessment (EA) prepared for the proposed private Georgetown University Boathouse in the C&O Canal NHP:

My questions regarding the proposal include:

- How would the public benefit from the loss of public parkland at the eastern gateway of the C&O Canal National Historical Park for the private use by Georgetown University?
- What precedent would approving this project set for future private development proposals in the Park?
- What would be the impacts on the experience of the park's approximately 3,000,000 yearly visitors from construction of the structure, and from loss of parkland at the park's eastern gateway? Please include analysis of potential traffic and public safety impacts, especially during construction but also during its operation throughout the year.
- What would be the potential impacts to nearby historic properties including the historic canal? What would be the direct, indirect, and cumulative impacts to the park and nearby historic structures from building a road to access this somewhat inaccessible site for construction, maintenance and servicing of the boathouse, as well as for access of the rowing hulls and boat trailers?
- What would be the direct, indirect, and cumulative impacts to the natural resources, floodplain and wetlands at the site of the proposed boathouse?
- On average, the Potomac River floods every 12 years.

What would be the potential impacts on the river including depth, flows, and riverbed contours; potential for riverbed changes due to deposition and scour of sediment and the need for dredging? How would this structure potentially influence potential flood damage to the canal and other park resources?

- What is the value of the national parkland at gateway site relative to land that Georgetown proposes to exchange?

C&O Canal NHP will become more valuable as multi-use public parkland with the passage of time. Proposals to transfer parkland for private use deserve the highest scrutiny. I respectfully request that instead of the limited-scope EA that has been proposed by Park Service, instead the Park Service complete a full Environmental Impact Statement (EIS) for the proposed project.

As a member of the interested public, I do not see any public benefit from the proposal. I fully support leaving the parkland in the park, and encouraging Georgetown University to look elsewhere in the region for an appropriate site.

Sincerely, Christine Plepys 2809 13TH RD S Arlington, VA 22204

p.s. Up until 2 months ago, I lived in DC for 12 years, and that is where I fell in love with the C&O. Please do not let it move away from the general public, keeping access to it and leaving it unharmed.



To: NCR\_Georgetownboathouse@nps.gov cc: Subject:

01/18/2005 02:41 PM PST

As one of the 3 million visitors who enjoy the C&O Canal National Historical Park each year, I am deeply concerned about a proposal to take part of the park for private use. The C&O Canal NHP provides the public with the opportunity to explore the best remaining example of the canals that once were used extensively. The park is also a great place to bird, hike, bike, and watch wildlife. This proposal jeopardizes those experiences.

In conjunction with the Defenders of the Potomac, the National Parks
Conservation Association and the many other preservation and conservation organizations involved in trying to protect this public treasure I would like to add my questions, concerns, and comments for your assessment.
Please include the following as part of the public record for the Environmental Assessment (EA) prepared for the proposed private Georgetown University Boathouse in the C&O Canal NHP:

My questions regarding the proposal include:

- How would the public benefit from the loss of public parkland at the eastern gateway of the C&O Canal National Historical Park for the private use by Georgetown University?
- What precedent would approving this project set for future private development proposals in the Park?
- What would be the impacts on the experience of the park's approximately 3,000,000 yearly visitors from construction of the structure, and from loss of parkland at the park's eastern gateway? Please include analysis of potential traffic and public safety impacts, especially during construction but also during its operation throughout the year.
- What would be the potential impacts to nearby

historic properties including the historic canal? What would be the direct, indirect, and cumulative impacts to the park and nearby historic structures from building a road to access this somewhat inaccessible site for construction, maintenance and servicing of the boathouse, as well as for access of the rowing hulls and boat trailers?

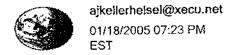
- What would be the direct, indirect, and cumulative impacts to the natural resources, floodplain and wetlands at the site of the proposed boathouse?
- On average, the Potomac River floods every 12 years. What would be the potential impacts on the river including depth, flows, and riverbed contours; potential for riverbed changes due to deposition and scour of sediment and the need for dredging? How would this structure potentially influence potential flood damage to the canal and other park resources?
- What is the value of the national parkland at gateway site relative to land that Georgetown proposes to exchange?

C&O Canal NHP will become more valuable as multi-use public parkland with the passage of time. Proposals to transfer parkland for private use deserve the highest scrutiny. I respectfully request that instead of the limited-scope EA that has been proposed by Park Service, instead the Park Service complete a full Environmental Impact Statement (EIS) for the proposed project.

As a member of the interested public, I do not see any public benefit from the proposal. I fully support leaving the parkland in the park, and encouraging Georgetown University to look elsewhere in the region for an appropriate site.

Sincerely,

Karen Jagielski 1921 Kearney St NE Washington DC 20018



To: NCR\_Georgetownboathouse@nps.gov

CC:

Subject: Please study the boathouse!

Office of Lands, Resources, and Planning National Capital Region National Park Service Washington, DC

Email - NCR\_Georgetownboathouse@nps.gov Fax - 202-401-0017

Good evening,

As one of the millions of visitors who enjoy hiking the C&O Canal National Historical Park with my family, I am deeply concerned about a proposal to take away part of the park for private use. This proposal jeopardizes my experiences and park memories.

In conjunction with the Defenders of the Potomac, the National Parks Conservation Association and the many other preservation and conservation organizations involved in trying to protect this public treasure, I would like to add my questions, concerns, and comments for your assessment. Please include

the following as part of the public record for the Environmental Assessment

prepared for the proposed private Georgetown University Boathouse in the C&O Canal NHP:

- How would the public benefit from the loss of public parkland at the eastern gateway of the C&O Canal National Historical Park for the private use by Georgetown University?
- What precedent would approving this project set for future private development proposals in the Park?
- What would be the impacts on the experience of the park's approximately 3,000,000 yearly visitors from construction of the structure, and from loss of parkland at the park's eastern gateway? Please include analysis of potential traffic and public safety impacts, especially during construction but also during its operation throughout the year.
- What would be the potential impacts to nearby historic properties including the historic canal? What would be the direct, indirect, and cumulative impacts to the park and nearby historic structures from building a road to access this somewhat inaccessible site for construction, maintenance and servicing of the boathouse, as well as for access of the rowing hulls and boat trailers?
- What would be the direct, indirect, and cumulative impacts to the natural resources, floodplain and wetlands at the site of the proposed boathouse?
- On average, the Potomac River floods every 12 years. What would be the potential impacts on the river including depth, flows, and riverbed contours; potential for riverbed changes due to deposition and scour of sediment and the need for dredging? How would this structure potentially influence potential flood damage to the canal and other park resources?

- What is the value of the national parkland at the gateway site relative to land that Georgetown proposes to exchange?

I am worried that I do not see any benefit as a member of the public from the current proposal. I respectfully request that instead of the limited-scope EA that has been proposed, the Park Service should complete a full Environmental Impact Statement for the proposed boathouse project. But really, Georgetown University should look elsewhere in the region for an appropriate site.

This park belongs to all Americans.

Sincerely,

Andrea J Keller Helsel 7004 Deep Cup Columbia, MD 21045



scott <hacktorious@cox.net>
01/18/2005 07:21 PM
EST
Please respond to hacktorious

To: NCR\_Georgetownboathouse@nps.gov

cc: takeaction@npca.org

Subject: Letter

### Dear Sir/Madam:

As one of the 3 million visitors who enjoy the C&O Canal National Historical Park each year, I am deeply concerned about a proposal to take part of the park for private use. The C&O Canal NHP provides the public with the opportunity to explore the best remaining example of the canals that once were used extensively. The park is also a great place to bird, hike, bike, and watch wildlife. This proposal jeopardizes those experiences.

In conjunction with the Defenders of the Potomac, the National Parks Conservation Association and the many other preservation and conservation organizations involved in trying to protect this public treasure I would like to add my questions, concerns, and comments for your assessment. Please include the following as part of the public record for the Environmental Assessment (EA) prepared for the proposed private Georgetown University Boathouse in the C&O Canal NHP:

- How would the public benefit from the loss of public parkland at the eastern gateway of the C&O Canal National Historical Park for the private use by Georgetown University?
- What precedent would approving this project set for future private development proposals in the Park?
- What would be the impacts on the experience of the park's approximately 3,000,000 yearly visitors from construction of the structure, and from loss of parkland at the park's eastern gateway? Please include analysis of potential traffic and public safety impacts, especially during construction but also during its operation throughout the year.
- What would be the potential impacts to nearby historic properties including the historic canal? What would be the direct, indirect, and cumulative impacts to the park and nearby historic structures from building a road to access this somewhat inaccessible site for construction, maintenance and servicing of the boathouse, as well as for access of the rowing hulls and boat trailers?
- What would be the direct, indirect, and cumulative impacts to the natural resources, floodplain and wetlands at the site of the proposed boathouse?
- On average, the Potomac River floods every 12 years. What would be the potential impacts on the river including depth, flows, and riverbed contours; potential for riverbed changes due to deposition and scour of sediment and the need for dredging? How would this structure potentially influence potential flood damage to the canal and other park resources?
- What is the value of the national parkland at gateway site relative to

land that Georgetown proposes to exchange?

C&O Canal NHP will become more valuable as multi-use public parkland with the passage of time. Proposals to transfer parkland for private use deserve the highest scrutiny. I respectfully request that instead of the limited-scope EA that has been proposed by Park Service, instead the Park Service complete a full Environmental Impact Statement (EIS) for the proposed project.

As a member of the interested public, I do not see any public benefit from the proposal. I fully support leaving the parkland in the park, and encouraging Georgetown University to look elsewhere in the region for an appropriate site.

1

Scott A. Macri (703)-352-1747 Northern Virginia Light Electric Vehicles (NOVALEV)

backtorious v



"Phyllis Kaplan Rowe" <pdkaplan@attglobal.n et>

cc:

To: <NCR\_Georgetownboathouse@nps.gov>

CC

Subject: C & O Canal

01/18/2005 07:47 PM EST Please respond to "Phyllis Kaplan Rowe"

January 2005

Office of Lands, Resources, and Planning National Capital Region National Park Service Washington, DC

Email - NCR Georgetownboathouse@nps.gov Fax -  $202-4\overline{0}1-0017$ 

Dear Sir/Madam:

As one of the 3 million visitors who enjoy the C&O Canal National Historical Park each year, I am deeply concerned about a proposal to take part of the park for private use. The C&O Canal NHP provides the public with the opportunity to explore the best remaining example of the canals that once were used extensively. The park is also a great place to bird, hike, bike, and watch wildlife. This proposal jeopardizes those experiences.

In conjunction with the Defenders of the Potomac, the National Parks Conservation Association and the many other preservation and conservation organizations involved in trying to protect this public treasure I would like to add my questions, concerns, and comments for your assessment. Please include the following as part of the public record for the Environmental Assessment (EA) prepared for the proposed private Georgetown University Boathouse in the C&O Canal NHP:

- How would the public benefit from the loss of public parkland at the eastern gateway of the C&O Canal National Historical Park for the private use by Georgetown University?
- What precedent would approving this project set for future private development proposals in the Park?
- What would be the impacts on the experience of the park's approximately 3,000,000 yearly visitors from construction of the structure, and from loss of parkland at the park's eastern gateway? Please include analysis of potential traffic and public safety impacts, especially during construction but also during its operation throughout the year.
- What would be the potential impacts to nearby historic properties including the historic canal? What would be the direct, indirect, and cumulative impacts to the park and nearby historic structures from building a road to access this somewhat inaccessible site for construction, maintenance and servicing of the boathouse, as well as for access of the rowing hulls and boat trailers?
- What would be the direct, indirect, and cumulative impacts to the natural resources, floodplain and wetlands at the site of the proposed boathouse?

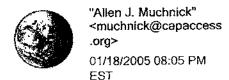
- On average, the Potomac River floods every 12 years. What would be the potential impacts on the river including depth, flows, and riverbed contours; potential for riverbed changes due to deposition and scour of sediment and the need for dredging? How would this structure potentially influence potential flood damage to the canal and other park resources?
- What is the value of the national parkland at gateway site relative to land that Georgetown proposes to exchange?

C&O Canal NHP will become more valuable as multi-use public parkland with the passage of time. Proposals to transfer parkland for private use deserve the highest scrutiny. I respectfully request that instead of the limited-scope EA that has been proposed by Park Service, instead the Park Service complete a full Environmental Impact Statement (EIS) for the proposed project.

As a member of the interested public, I do not see any public benefit from the proposal. I fully support leaving the parkland in the park, and encouraging Georgetown University to look elsewhere in the region for an appropriate site.

Sincerely,

Phyllis Kaplan Rowe, Ph. D.



To: NCR\_Georgetownboathouse@nps.gov cc:

Subject: EA Scoping for GU Boathouse

January 18, 2005

Office of Lands, Resources, and Planning National Capital Region National Park Service Washington, DC

Email - NCR\_Georgetownboathouse@nps.gov

Re: Environmental Assessment Scoping for Georgetown University Boathouse

Dear Sir/Madam:

As a frequent visitor to the C&O Canal National Historical Park and its Capital Crescent Trail, I am outraged that Georgetown University seeks to take part of this park for private use. The C&O Canal NHP is a rare public amenity that preserves the best remaining example of the canals that once were used extensively and allows millions of people to exercise, explore, and observe wildlife close to the heart of the Nation's Capital. The proposed private boathouse facility would severely degrade those experiences.

Please include the following questions, concerns, and comments as part of the public record for the upcoming Environmental Assessment (EA) of the proposed private Georgetown University Boathouse in the C&O Canal NHP:

- How would this taking of public parkland at the eastern gateway of the C&O Canal National Historical Park for private use by Georgetown University be in the public interest?
- Would approving this project set any precedents for future private development proposals in this and other NPS parks?
- How would this proposal affect the experience of the park's approximately 3 million yearly visitors from construction of the structure, and from loss of parkland at the park's eastern gateway? Please include analysis of potential traffic and public safety impacts, especially during construction but also during its operation throughout the year. Also, please include the increased traffic and parking on Water St and K St NW in your analysis.
- How would nearby historic properties and the historic canal be impacted, including direct, indirect, and cumulative impacts to the park and nearby historic structures from building a road to access this somewhat inaccessible site for construction, maintenance and servicing of the boathouse, as well as for access of the rowing hulls and boat trailers?
- Please enumerate and evaluate the direct, indirect, and cumulative impacts to the natural resources, floodplain, wetlands, and non-motorized transportation and recreation facilities at the site of the proposed boathouse?

- The Potomac River floods about every 12 years. How would the project affect the river, including depth, flows, and riverbed contours; potential for riverbed changes due to deposition and scour of sediment and the need for dredging? How would this structure potentially influence potential flood damage to the canal and other park resources?
- How does the monetary and park value of the national parkland at the gateway site compare with the land that Georgetown University proposes to exchange?

The value of the C&O Canal NHP as multi-use public parkland will only increase with time. All proposals to transfer parkland for private use deserve the highest scrutiny, and I respectfully request that the National Park Service complete a full Environmental Impact Statement (EIS) for this proposed project.

As a frequent park visitor, I do not see any public benefit from this proposal. Please leave the parkland in the park and encourage Georgetown University to locate its boathouse on a previously developed site.

Sincerely,

Allen Muchnick, President Virginia Bicycling Federation PO Box 5621, Arlington VA 22205 muchnick@capaccess.org 703-271-0895 http://vabike.org



To: <NCR\_Georgetownboathouse@nps.gov>

Subject: Full EIS for the Behemoth Boathouse!

January 18, 2005

Director, Office of Lands, Resources and Planning National Capital Region National Park Service 1100 Ohio Drive, SW Washington, DC 20242 FAX-(202) 401-0017 Email - NCR\_Georgetownboathouse@nps.gov

## Dear NPS:

Please include the following "issues and alternatives" as part of the Environmental Assessment (EA) for the proposed private Georgetown University Boathouse in the C&O Canal National Historical Park:

### I. ISSUES:

- The use of a section of the C&O Canal National Park for private development and the setting of a precedent for future private development in the Park;
- Significant impacts to the scenic Potomac River views from the Towpath, Virginia, Key Bridge and the River, from the construction of the enormous boathouse (the length of a football field and 50 feet high);
- Potential impacts to nearby historic properties (Washington Canoe Club, Canal embankment);
- Safety at the busy, narrow, fragile recreational and commuter corridor at the gateway entrance to the Park and the Capital Crescent Trail (CCT);
- Direct and indirect impacts to the natural resources, floodplain and wetlands at the site of the proposed boathouse;
- Potential impacts to public health during and after construction of the boathouse (if the corroding 84-inch diameter sewer line which runs through the proposed boathouse site is ever ruptured);
- Significant impacts to Park and nearby historic structures from building a private road to access the (inaccessible) site for construction, maintenance and servicing of the boathouse, as well as for access of the rowing hulls and boat trailers;
- River flows including depth, flows, and riverbed contours; potential for riverbed changes due to deposition and scour of sediment and the need for dredging.
- Size, design, location and use of the proposed collegiate boathouse;
- Cumulative impacts from the construction of three proposed boathouses in the vicinity of Key Bridge (two private university boathouses and one public boathouse) as well as a fourth

boathouse on the Virginia shore;

- Impact on the pedestrian and vehicular traffic in an already constricted space with no parking at the site;
- Value of national parkland at gateway site relative to land owned by GU proposed for land exchange, and legality of such an exchange;
- Impact from utilities (underground, above ground) and effects from lights and noise before, during and after hours of operation of the boathouse;
- Effect on shoreline boaters from 75-foot private dock extending out into river;
- Hydrological issues related to the floodplain/runoff related to the development and effect of the boathouse on downstream structures;
- Waterfront issues related to the goals and objectives of the DC Comprehensive Plan.
- Direct and indirect impacts to the non-motorized boathouse zone for the Georgetown Waterfront Park if the Whitehurst Freeway is demolished.

Among the many "alternatives" that should be considered in the EA are two environmentally friendly plans:

## II. ALTERNATIVES:

- Alternative A: Consider building a collegiate facility smaller than the one proposed, outside the Park and immediately downstream of the Washington Canoe Club, at the old Dempsey boathouse site;
- Alternative B: Instead of three separate boathouses, consider building only one public-private facility (a Georgetown "Universal" Boathouse), outside the C&O Park, between 34th St. and Key Bridge, and open to university, high school and public boating programs, like Thompson's Boathouse at the south end of Georgetown. (A sketch of Alternative A and B are available at www.savethecanal.org, under "Alternatives."
- (Consider other alternatives outside the Georgetown non-motorized boathouse zone, including redevelopment of existing Thompson's, and other sites along the Potomac, Anacostia and Virginia shorelines, as well as no action.)

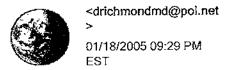
# III. ADVANTAGES OF THE ABOVE-MENTIONED "ALTERNATIVES" OVER THE NPS-ALTERNATIVE IN THE C&O PARK:

- Protection of undeveloped national parkland from private development;
- Preservation of green open space along a tidal floodplain for future generations (while redeveloping already paved land);
- Elimination of the need for a private access road to the proposed site;
- Easy access for construction, maintenance and servicing of the boathouse, as well as for access of rowing hulls and boat trailers (especially true for Alternative B);
- Safer location, less congested traffic since sites are farther from busy entrance to the Park and CCT (especially true for Alternative B);
- Near public parking;
- Available to both public and private boating interests (only true for Alternative B);
- Away from historic properties (only true for Alternative B);

- Opportunity to develop one world class facility for the use of all boating interests, including high school boaters (only true for Alternative B).

Instead of the limited-scope EA that has been proposed by NPS, an Environmental Impact Statement (EIS) of the entire Georgetown non-motorized boathouse zone, between 34th St. and Key Bridge, should be done. An EIS would demonstrate the environmental, practical, technical and logistical advantages of moving the proposed location downstream from the currently proposed NPS alternative in the Park. An environmental analysis, as well as cost-benefit, engineering, viewshed and traffic studies of the zone should be included in the EIS, and a draft version of the report made available to the public for comments. (Note - NPS is already in the process of doing an EIS to identify a site for just one boathouse for the Arlington County, Virginia, shoreline, but has not yet considered doing an EIS for the Georgetown boathouse zone, where three proposed boathouses are contemplated!)

Sincerely, Douglas E. Lesar Kensington, MD



To: <NCR\_Georgetownboathouse@nps.gov> cc: Subject:

January 2005

Office of Lands, Resources, and Planning National Capital Region National Park Service Washington, DC

Email - NCR\_Georgetownboathouse@nps.gov Fax - 202-401-0017

Dear Sir/Madam:

As one of the 3 million visitors who enjoy the C&O Canal National Ristorical Park each year, I am deeply concerned about a proposal to take part of the park for private use. The C&O Canal NHP provides the public with the opportunity to explore the best remaining example of the canals that once were used extensively. The park is also a great place to bird, hike, bike, and watch wildlife. This proposal jeopardizes those experiences.

In conjunction with the Defenders of the Potomac, the National Parks Conservation Association and the many other preservation and conservation organizations involved in trying to protect this public treasure I would like to add my questions, concerns, and comments for your assessment. Please include the following as part of the public record for the Environmental Assessment (EA) prepared for the proposed private Georgetown University Boathouse in the C&O Canal NHP:

- How would the construction and resulting structure affect pedestrian and bicycle access to the C&O Park?
- How would the public benefit from the loss of public parkland at the eastern gateway of the C&O Canal National Historical Park for the private use by Georgetown University?
- What precedent would approving this project set for future private development proposals in the Park?
- What would be the impacts on the experience of the park's approximately 3,000,000 yearly visitors from construction of the structure, and from loss of parkland at the park's eastern gateway? Please include analysis of potential traffic and public safety impacts, especially during construction but also during its operation throughout the year.
- What would be the potential impacts to nearby historic properties including the historic canal? What would be the direct, indirect, and cumulative impacts to the park and nearby historic structures from building a road to access this somewhat inaccessible site for construction, maintenance and servicing of the boathouse, as well as for access of the rowing hulls and boat trailers?
- What would be the direct, indirect, and cumulative impacts to the

natural resources, floodplain and wetlands at the site of the proposed boathouse?

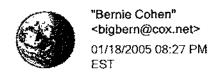
- On average, the Potomac River floods every 12 years. What would be the potential impacts on the river including depth, flows, and riverbed contours; potential for riverbed changes due to deposition and scour of sediment and the need for dredging? How would this structure potentially influence potential flood damage to the canal and other park resources?
- What is the value of the national parkland at gateway site relative to land that Georgetown proposes to exchange?

C&O Canal NHP will become more valuable as multi-use public parkland with the passage of time. Proposals to transfer parkland for private use deserve the highest scrutiny. I respectfully request that instead of the limited-scope EA that has been proposed by Park Service, instead the Park Service complete a full Environmental Impact Statement (EIS) for the proposed project.

As a member of the interested public, I am skeptical as to any public benefit from the proposal. Absent any public benefit, I fully support leaving the parkland in the park, and encouraging Georgetown University to look elsewhere in the region for an appropriate site.

Sincerely,

David R Richmond 9430 Forest Haven Dr Alexandria, Va 22309



To: <NCR\_Georgetownboathouse@nps.gov>

cc: <TakeAction@npca.org>, <muchnick@capaccess.org>

Subject: Georgetown Boathouse

January 18, 2005

Office of Lands, Resources, and Planning
National Capital Region
National Park Service
Washington, DC

Dear Sir/Madam:

Although the following is a verbatim letter that was suggested for me to send, it accurately expresses my feelings on this matter. For years, my family, friends and myself have enjoyed using the C&O Canal trail and the wonderful addition of the Crescent Trail. We would not like to see any part of it obliterated for any use that would alter its present state.

Thank you for your consideration.

Bernard Cohen

As one of the 3 million visitors who enjoy the C&O Canal National Historical Park each year, I am deeply concerned about a proposal to take part of the park for private use. The C&O Canal NHP provides the public with the opportunity to explore the best remaining example of the canals that once were used extensively. The park is also a great place to bird, hike, bike, and watch wildlife. This proposal jeopardizes those experiences.

In conjunction with the Defenders of the Potomac, the National Parks

Conservation Association and the many other preservation and conservation
organizations involved in trying to protect this public treasure I would

like to add my questions, concerns, and comments for your assessment.

Please include the following as part of the public record for the

Environmental Assessment (EA) prepared for the proposed private Georgetown

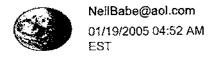
University Boathouse in the C&O Canal NHP:

- How would the public benefit from the loss of public parkland at the eastern gateway of the C&O Canal National Historical Park for the private use by Georgetown University?
- What precedent would approving this project set for future private development proposals in the Park?
- What would be the impacts on the experience of the park's approximately 3,000,000 yearly visitors from construction of the structure, and from loss of parkland at the park's eastern gateway? Please include analysis of potential traffic and public safety impacts, especially during construction but also during its operation throughout the year.
- What would be the potential impacts to nearby historic properties including the historic canal? What would be the direct, indirect, and cumulative impacts to the park and nearby historic structures from building a road to access this somewhat inaccessible site for construction, maintenance and servicing of the boathouse, as well as for access of the rowing hulls and boat trailers?

- What would be the direct, indirect, and cumulative impacts to the natural resources, floodplain and wetlands at the site of the proposed boathouse?
- On average, the Potomac River floods every 12 years. What would be the potential impacts on the river including depth, flows, and riverbed contours; potential for riverbed changes due to deposition and scour of sediment and the need for dredging? How would this structure potentially influence potential flood damage to the canal and other park resources?
- What is the value of the national parkland at gateway site relative to land that Georgetown proposes to exchange?

C&O Canal NHP will become more valuable as multi-use public parkland with the passage of time. Proposals to transfer parkland for private use deserve the highest scrutiny. I respectfully request that instead of the limited-scope EA that has been proposed by Park Service, instead the Park Service complete a full Environmental Impact Statement (EIS) for the proposed project.

As a member of the interested public, I do not see any public benefit from the proposal. I fully support leaving the parkland in the park, and encouraging Georgetown University to look elsewhere in the region for an appropriate site.



To: NCR\_Georgetownboathouse@nps.gov

CC:

Subject: Georgetown Boat House Issue

January 19, 2005

Office of Lands, Resources, and Planning National Capital Region National Park Service Washington, DC

Email - NCR\_Georgetownboathouse@nps.gov Fax - 202-401-0017

National Park Service:

As a regular user of the C&O Canal National Historical Park, I am concerned about the proposal to take part of the park for a private club use. The park is a unique place to bird, hike, bike, and watch wildlife. It serves as a commuter path for many who bike to work rather than clogging our downtown streets and highways. A large private club on parkland would change the character of the park and the path in the Georgetown area in a negative way.

I support the efforts of the Defenders of the Potomac, the National Parks Conservation Association and other preservation and conservation organizations involved in protecting the Canal and request that you seriously scrutinize the environmental assessment prepared for the private Georgetown University Boathouse in the C&O Canal NHP.

How would the public benefit from the loss of public parkland at the eastern gateway of the C&O Canal National Historical Park for the private use by Georgetown University?

Is this not a dangerous precedent for other private developments within the park?

What are the direct, indirect, and cumulative impacts to the natural resources, floodplain and wetlands at the site of the proposed boathouse?

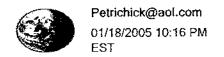
How would this structure potentially influence potential flood damage to the canal and other park resources?

The C&O Canal NHP is a wonderful resource representing the wisdom of past NPS decisions to create and preserve a multi-use public parkland as an integral part of our nation's capital. It is enjoyed and used more by the local citizens of our city than other parks in the National Capital Region. Proposals to transfer parkland for the private use of an elite University Club will remove the path's access to the waterfront and replace it in this area with fences and security. If this proposal is going to be fairly considered, the Park Service should undertake a full Environmental Impact Statement (EIS) for the proposed project.

As an avid user of this wonderful park, I see no public benefit from the proposal. I support leaving the parkland in the park and encouraging Georgetown University to look elsewhere in the region for an appropriate site.

Sincerely,

Nellie L. Longsworth 5202 Carlton Street Bethesda, MD 20816 Nellbabe@aol.com



To: NCR\_Georgetownboathouse@nps.gov

CC:

Subject: Georgetown Boathouse

18 January 2005

Office of Lands, Resources and Planning National Capital Region National Park Service 1100 Ohio Drive, SW Washington DC 20242

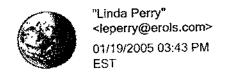
My name is Gary Petrichick. I live in Belmont, New York; retired after over thirty years in community planning including eight years as County Planning Director for Allegany County, New York. I served as President of the Chesapeake and Ohio Canal Association in 1996 and 1997, have hiked the length of the Canal three times, have bicycled it seven, and have authored a book on the Civil War on the Canal. I mention this to make clear that I am intimately familiar with both urban land use practice and the C&O Canal.

As such, I wish to be placed on record as <u>opposing the Georgetown University boathouse project</u> as presently envisioned. I see no need to enumerate specific questions and objections. First, that is being ably done by countless other concerned citizens. Second, I suspect that almost everyone involved already knows in his heart that the scope of this project goes far beyond the capabilities of the site.

Rationally, the project would be terminated at this point and a search for a suitable site would be initiated, but since that is not happening, a full Environmental Impact Statement must be undertaken to expose to all participants and to the general public, the effects this project will have on the Potomac River, the C&O Canal, and the community.

Thank you for the opportunity to be heard.

Gary M. Petrichick 36 Willets Avenue Belmont NY 14813 (585) 268-5187



To: <NCR\_Georgetownboathouse@nps.gov>

cc:

Subject: Re: Proposed Georgetown UniversityBoathouse:Need for Environmental Assessment

---- Original Message -----

From: Linda Perry

To: NCR Georgetownboathouse@nps.gov Sent: Wednesday, January 19, 2005 11:20 AM

Subject: Proposed Georgetown UniversityBoathouse: Need for Environmental Assessment

January 20, 2005

I would like to have these comments added to the public record concerning the Georgetown University Boathouse proposal.

Dear Sirs.

As a lover of the C&O Canal, I am very concerned at the proposal to build a gigantic boathouse that impacts the beautiful, historical towpath. The C&O Canal needs to be protected from such infringements and intrusions so future Americans will be able to enjoy the vision of Justice William Douglas.

Here are several points to consider:

- 1. How will the site impact the busy recreational and commuter corridor (the Capital Crescent Trail) that is used by hikers, bikers, naturalists, etc.? It would surely have a negative impact.
- 2. What access is there for servicing and maintaining the building? How would access negatively affect the canal?
- 3. What about the 84-sewer line that runs from Virginia, Maryland, and DC that is near the site? It would appear that damage could occur to the line.
- 4. What of the need for a hydraulic study to determine the impacts on the canal berm and the Washington Canoe Club during floods? Because floods are a regular natural phenomena, how would a flood destroy the canal because of the construction of this huge, out-of-place proposed boathouse? This project would force floodwaters into a narrow passage between the building and the embankment, potentially eroding the foundation of the canal and towpath. In addition, the riverbank could also be affected by the removal of trees and subsequent construction.
- 5. Are there any wetlands on the site? What is the impact of changing the environment of the wetlands?

As I look at the proposal, I note that there is an environmentally preferred alternative site downstream and outside the national park. Why not utilize this site instead of proposing a boathouse at the gateway to the C&O Canal National Historical Park, which is a national and local treasure. The C&O Canal gateway should definitely remain in the public domain.

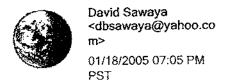
As a biker and hiker, member of the C&O Canal Association, and lover of our beautiful Chesapeake and Ohio National Historical Park, I beseech you to prepare a full Environmental Impact Statement and that alternative sites must be considered in the study.

I am also concerned that if this boathouse were allowed to be built, it would not only destroy the scenic and historic view of the canal, but set a precedent for future intrusions on the canal.

Thank you.

Sincerely,

Linda E. Perry 116 S. Conococheague Street Williamsport, MD 21795



To: NCR\_Georgetownboathouse@nps.gov

CC:

Subject: Possibly Spam: C&O Canal Development Proposal

## Dear Sir/Madam:

As one of the 3 million visitors who enjoy the C&O Canal National Historical Park each year, I am deeply concerned about a proposal to take part of the park for private use. The C&O Canal NHP provides the public with the opportunity to explore the best remaining example of the canals that once were used extensively. The park is also a great place to bird, hike, bike, and watch wildlife. This proposal jeopardizes those experiences.

On a personal note, I use this path often while biking and running. The entrance to the park near Rock Creek Parkway, which is threatened by this proposal provides convenient non-motorized access to Rock Creek Park and the adjoining Capitol Crescent Trail. I know numerous people who use this route on weekends and evenings for excercise and recreation because it provides a great opportunity to enjoy DC without the fear of traffic. Destroying this route, would cause bicycle and pedestrian traffic to flood Georgetown's streets to find alternate routes increasing congestion and posing a safety risk.

In conjunction with the Defenders of the Potomac, the National Parks Conservation Association and the many other preservation and conservation organizations involved in trying to protect this public treasure I would like to add my questions, concerns, and comments for your assessment. Please include the following as part of the public record for the Environmental Assessment (EA) prepared for the proposed private Georgetown University Boathouse in the C&O Canal NHP:

- How would the public benefit from the loss of public parkland at the eastern gateway of the C&O Canal National Historical Park for the private use by Georgetown University?
- What precedent would approving this project set for future private development proposals in the Park?
- What would be the impacts on the experience of the park's approximately 3,000,000 yearly visitors from construction of the structure, and from loss of parkland at the park's eastern gateway? Please include

analysis of potential traffic and public safety impacts, especially during construction but also during its operation throughout the year.

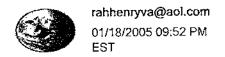
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- On average, the Potomac River floods every 12 years. What would be the potential impacts on the river including depth, flows, and riverbed contours; potential for riverbed changes due to deposition and scour of sediment and the need for dredging? How would this structure potentially influence potential flood damage to the canal and other park resources?
- What is the value of the national parkland at gateway site relative to land that Georgetown proposes to exchange?

C&O Canal NHP will become more valuable as multi-use public parkland with the passage of time. Proposals to transfer parkland for private use deserve the highest scrutiny. I respectfully request that instead of the limited-scope EA that has been proposed by Park Service, instead the Park Service complete a full Environmental Impact Statement (EIS) for the proposed project.

As a member of the interested public, I do not see any public benefit from the proposal. I fully support leaving the parkland in the park, and encouraging Georgetown University to look elsewhere in the region for an appropriate site.

Sincerely,

Do you Yahoo!? Meet the <u>all-new My Yahoo!</u> – Try it today!



To: NCR\_Georgetownboathouse@nps.gov

cc:

Subject: Proposed Boathouse

Office of Lands, Resources, and Planning National Capital Region National Park Service Washington, DC

Email - NCR\_Georgetownboathouse@nps.gov Fax - 202-401-0017

Dear Sir/Madam:

As one of the 3 million visitors who enjoy the C&O Canal National Historical Park each year, I am deeply concerned about a proposal to take part of the park for private use. The C&O Canal NHP provides the public with the opportunity to explore the best remaining example of the canals that once were used extensively. The park is also a great place to bird, hike, bike, and watch wildlife. This proposal jeopardizes those experiences.

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- What would be the direct, indirect, and cumulative impacts to the natural resources, floodplain and wetlands at the site of the proposed

### boathouse?

- On average, the Potomac River floods every 12 years. What would be the potential impacts on the river including depth, flows, and riverbed contours; potential for riverbed changes due to deposition and scour of sediment and the need for dredging? How would this structure potentially influence potential flood damage to the canal and other park resources?
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C&O Canal NHP will become more valuable as multi-use public parkland with the passage of time. Proposals to transfer parkland for private use deserve the highest scrutiny. I respectfully request that instead of the limited-scope EA that has been proposed by Park Service, instead the Park Service complete a full Environmental Impact Statement (EIS) for the proposed project.

As a member of the interested public, I do not see any public benefit from the proposal. I fully support leaving the parkland in the park, and encouraging Georgetown University to look elsewhere in the region for an appropriate site.

Sincerely, Richard Henry To: NCR\_Georgetownboathouse@nps.gov cc: takeaction@npca.org

Subject:

01/18/2005 10:16 PM EST

As one of the 3 million visitors who enjoy the C&O Canal National Historical Park each year, I am deeply concerned about a proposal to take part of the park for private use. The C&O Canal NHP provides the public with the opportunity to explore the best remaining example of the canals that once were used extensively. The park is also a great place to bird, hike, bike, and watch wildlife. This proposal jeopardizes those experiences.

In conjunction with the Defenders of the Potomac, the National Parks Conservation Association and the many other preservation and conservation organizations involved in trying to protect this public treasure I would like to add my questions, concerns, and comments for your assessment. Please include the following as part of the public record for the Environmental Assessment (EA) prepared for the proposed private Georgetown University Boathouse in the C&O Canal NHP:

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sediment and the need for dredging? How would this structure potentially influence potential flood damage to the canal and other park resources?

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 ${\tt C\&O}$  Canal NHP will become more valuable as multi-use public parkland with

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limited-scope EA that has been proposed by Park Service, instead the Park

Service complete a full Environmental Impact Statement (EIS) for the proposed project.

As a member of the interested public, I do not see any public benefit from

the proposal. I fully support leaving the parkland in the park, and encouraging Georgetown University to look elsewhere in the region for an appropriate site.

Ed Krafsur ekrafsur@comcast.net



To: NCR\_Georgetownboathouse@nps.gov

cc: TakeAction@ncpa.org

Subject: Georgetown University Land Exchange

January 18, 2005

Office of Lands, Resources, and Planning National Capital Region National Park Service Washington, DC

Email - NCR\_Georgetownboathouse@nps.gov Fax - 202-401-0017

Dear Sir/Madam:

As one of the 3 million visitors who enjoy the C&O Canal National Historical Park each year, I am deeply concerned about a proposal to take part of the park for private use. The C&O Canal NHP provides the public with the opportunity to explore the best remaining example of the canals that once were used extensively. The park is also a great place to bird, hike, bike, and watch wildlife. This proposal jeopardizes those experiences.

In conjunction with the Defenders of the Potomac, the National Parks Conservation Association and the many other preservation and conservation organizations involved in trying to protect this public treasure I would like to add my questions, concerns, and comments for your assessment. Please include the following as part of the public record for the Environmental Assessment (EA) prepared for the proposed private Georgetown University Boathouse in the C&O Canal NHP:

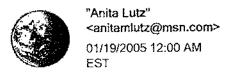
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- What precedent would approving this project set for future private development proposals in the Park?

- What would be the impacts on the experience of the park's approximately 3,000,000 yearly visitors from construction of the structure, and from loss of parkland at the park's eastern gateway? Please include analysis of potential traffic and public safety impacts, especially during construction but also during its operation throughout the year.
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As a member of the interested public, I do not see any public benefit from the proposal. I fully support leaving the parkland in the park, and encouraging Georgetown University to look elsewhere in the region for an appropriate site.

Sincerely, Kathleen Carroll 2900 Dawson Avenue Wheaton, MD 20902



To: <NCR\_Georgetownboathouse@nps.gov>
cc: "NPCA" <lakeaction@npca.org>

Subject: Protect the C&O Canal

18 January 2005

Office of Lands, Resources, and Planning National Capital Region National Park Service Washington, DC

## Dear Sir/Madam:

As one of the 3 million visitors who enjoy the C&O Canal National Historical Park each year, I am deeply concerned about a proposal to take part of the park for private use. The C&O Canal NHP provides the public with the opportunity to explore the best remaining example of the canals that once were used extensively. The park is also a great place to bird, hike, bike, and watch wildlife. This proposal jeopardizes those experiences.

In conjunction with the Defenders of the Potomac, the National Parks Conservation Association and the many other preservation and conservation organizations involved in trying to protect this public treasure I would like to add my questions, concerns, and comments for your assessment. Please include the following as part of the public record for the Environmental Assessment (EA) prepared for the proposed private Georgetown University Boathouse in the C&O Canal NHP:

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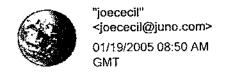
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- What is the value of the national parkland at gateway site relative to land that Georgetown proposes to exchange?

C&O Canal NHP will become more valuable as multi-use public parkland with the passage of time. Proposals to transfer parkland for private use deserve the highest scrutiny. I respectfully request that instead of the limited-scope EA that has been proposed by Park Service, instead the Park Service complete a full Environmental Impact Statement (EIS) for the proposed project.

As a member of the interested public, I do not see any public benefit from the proposal. I fully support leaving the parkland in the park, and encouraging Georgetown University to look elsewhere in the region for an appropriate site.

Sincerely,

Anita M. Lutz 10320 Westlake Drive, Apt 203 Bethesda, MD 20817-6443



To: NCR\_Georgetownboathouse@nps.gov cc: Subject:

January 2005

Office of Lands, Resources, and Planning National Capital Region National Park Service Washington, DC

Email - NCR Georgetownboathouse@nps.gov Fax - 202-401-0017

Dear Sir/Madam:

As one of the 3 million visitors who enjoy the C&O Canal National Historical Park each year, I am deeply concerned about a proposal to take part of the park

for private use. The C&O Canal NHP provides the public with the opportunity to explore the best remaining example of the canals that once were used extensively. The park is also a great place to bird, hike, bike, and watch wildlife. This proposal jeopardizes those experiences.

In conjunction with the Defenders of the Potomac, the National Parks Conservation Association and the many other preservation and conservation organizations involved in trying to protect this public treasure I would like

add my guestions, concerns, and comments for your assessment. Please include the

following as part of the public record for the Environmental Assessment (EA) prepared for the proposed private Georgetown University Boathouse in the C&O Canal NHP:

- How would the public benefit from the loss of public parkland at the eastern gateway of the C&O Canal National Historical Park for the private use by Georgetown University?
- What precedent would approving this project set for future private development proposals in the Park?
- What would be the impacts on the experience of the park's approximately 3,000,000 yearly visitors from construction of the structure, and from loss of parkland at the park's eastern gateway? Please include analysis of potential traffic and public safety impacts, especially during construction but also during its operation throughout the year.
- What would be the potential impacts to nearby historic properties including the historic canal? What would be the direct, indirect, and cumulative impacts to the park and nearby historic structures from building a road to access this somewhat inaccessible site for construction, maintenance and servicing of the boathouse, as well as for access of the rowing hulls and boat trailers?

- What would be the direct, indirect, and cumulative impacts to the natural resources, floodplain and wetlands at the site of the proposed boathouse?
- On average, the Potomac River floods every 12 years. What would be the potential impacts on the river including depth, flows, and riverbed contours; potential for riverbed changes due to deposition and scour of sediment and the need for dredging? How would this structure potentially influence potential flood damage to the canal and other park resources?
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As a member of the interested public, I do not see any public benefit from the proposal. I fully support leaving the parkland in the park, and encouraging Georgetown University to look elsewhere in the region for an appropriate site.

Sincerely,
joe cecil, Barboursville Virginia, Farmville Virginia

Nam Myoho Renge Kyo



Peter Wiecki
<pwiecki@gmail.com>
01/19/2005 06:18 AM
EST
Please respond to Peter
Wiecki

To: NCR\_Georgetownboathouse@nps.gov cc:

Subject: Save the Canal

January 2005

Office of Lands, Resources, and Planning National Capital Region National Park Service Washington, DC

Email - NCR\_Georgetownboathouse@nps.gov Fax - 202-401-0017

Dear Sir/Madam:

As one of the 3 million visitors who enjoy the C&O Canal National Historical Park each year, I am deeply concerned about a proposal to take part of the park for private use. The C&O Canal NHP provides the public with the opportunity to explore the best remaining example of the canals that once were used extensively. The park is also a great place to bird, hike, bike, and watch wildlife. This proposal jeopardizes those experiences.

In conjunction with the Defenders of the Potomac, the National Parks Conservation Association and the many other preservation and conservation organizations involved in trying to protect this public treasure I would like to add my questions, concerns, and comments for your assessment. Please include the following as part of the public record for the Environmental Assessment (EA) prepared for the proposed private Georgetown University Boathouse in the C&O Canal NHP:

- How would the public benefit from the loss of public parkland at the eastern gateway of the C&O Canal National Historical Park for the private use by Georgetown University?
- What precedent would approving this project set for future private development proposals in the Park?
- What would be the impacts on the experience of the park's approximately 3,000,000 yearly visitors from construction of the structure, and from loss of parkland at the park's eastern gateway? Please include analysis of potential traffic and public safety impacts, especially during construction but also during its operation throughout the year.
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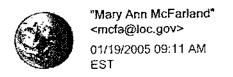
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As a member of the interested public, I do not see any public benefit from the proposal. I fully support leaving the parkland in the park, and encouraging Georgetown University to look elsewhere in the region for an appropriate site.

Sincerely,

Peter Wiecki



To: <NCR\_Georgetownboathouse@nps.gov>

Subject: Proposed privatization of the eastern gateway of C&O NHP

## Dear Sir/Madam:

As one of the 3 million visitors who enjoy the C&O Canal National Historical Park each year, I am deeply concerned about a proposal to take part of the park for private use. The C&O Canal NHP provides the public with the opportunity to explore the best remaining example of the canals that once were used extensively. The park is also a great place to bird, hike, bike, and watch wildlife. This proposal jeopardizes those experiences.

In conjunction with the Defenders of the Potomac, the National Parks Conservation Association and the many other preservation and conservation organizations involved in trying to protect this public treasure I would like to add my questions, concerns, and comments for your assessment. Please include the following as part of the public record for the Environmental Assessment (EA) prepared for the proposed private Georgetown University Boathouse in the C&O Canal NHP:

- How would the public benefit from the loss of public parkland at the eastern gateway of the C&O Canal National Historical Park for the private use by Georgetown University?
- What precedent would approving this project set for future private development proposals in the Park?
- What would be the impacts on the experience of the park's approximately 3,000,000 yearly visitors from construction of the structure, and from loss of parkland at the park's eastern gateway? Please include analysis of potential traffic and public safety impacts, especially during construction but also during its operation throughout the year.
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- What would be the direct, indirect, and cumulative impacts to the natural resources, floodplain and wetlands at the site of the proposed boathouse?
- On average, the Potomac River floods every 12 years. What would be the potential impacts on the river including depth, flows, and riverbed contours; potential for riverbed changes due to deposition and scour of sediment and the need for dredging? How would this structure potentially influence potential flood damage to the canal and other park resources?
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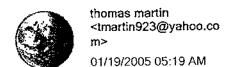
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As a member of the interested public, I do not see any public benefit from the proposal. I fully support leaving the parkland in the park, and encouraging Georgetown University to look elsewhere in the region for an appropriate site.

Sincerely,

Do You Yahoo!? Tired of spam? Yahoo! Mail has the best spam protection around http://mail.yahoo.com



PST

To: NCR\_Georgetownboathouse@nps.gov

CC

Subject: Georgetown Boathouse

Dear Sir/Madam:

As one of the 3 million visitors who enjoy the C&O Canal National Historical Park each year (the biking, hiking and strolling is great in an urban area like ours!), I am deeply concerned about a proposal to take part of the park for private use. The C&O Canal NHP provides the public with the opportunity to explore the best remaining example of the canals that once were used extensively. The park is also a great place to bird, hike, bike, and watch wildlife. This proposal jeopardizes those experiences.

In conjunction with the Defenders of the Potomac, the National Parks Conservation Association and the many other preservation and conservation organizations involved in trying to protect this public treasure I would like to add my questions, concerns, and comments for your assessment. Please include the following as part of the public record for the Environmental Assessment (EA) prepared for the proposed private Georgetown University Boathouse in the C&O Canal NHP:

- How would the public benefit from the loss of public parkland at the eastern gateway of the C&O Canal National Historical Park for the private use by Georgetown University?
- What precedent would approving this project set for future private development proposals in the Park?
- What would be the impacts on the experience of the park's approximately 3,000,000 yearly visitors from construction of the structure, and from loss of parkland at the park's eastern gateway? Please include analysis of potential traffic and public safety impacts, especially during construction but also during its operation throughout the year.
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As a member of the interested public, I do not see any public benefit from the proposal. I fully support leaving the parkland in the park, and encouraging Georgetown University to look elsewhere in the region for an appropriate site.

Sincerely,

Do You Yahoo!? Tired of spam? Yahoo! Mail has the best spam protection around http://mail.yahoo.com



"Capozzi Michael" <capozzi\_michael@bah .com>

01/19/2005 09:13 AM EST To: NCR\_Georgetownboathouse@nps.gov

cc:

Subject: C & O Canal and Georgetown University

January 2005

Office of Lands, Resources, and Planning National Capital Region National Park Service Washington, DC

Email - NCR Georgetownboathouse@nps.gov Fax - 202-401-0017

Dear Sir/Madam:

As one of the 3 million visitors who enjoy the C&O Canal National Historical Park each year, I am deeply concerned about a proposal to take part of the park for private use. The C&O Canal NHP provides the public with the opportunity to explore the best remaining example of the canals that once were used extensively. The park is also a great place to bird, hike, bike, and watch wildlife. This proposal jeopardizes those experiences.

In conjunction with the Defenders of the Potomac, the National Parks Conservation Association and the many other preservation and conservation organizations involved in trying to protect this public treasure I would like to add my questions, concerns, and comments for your assessment. Please include the following as part of the public record for the Environmental Assessment (EA) prepared for the proposed private Georgetown University Boathouse in the C&O Canal NHP:

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C&O Canal NHP will become more valuable as multi-use public parkland with the passage of time. Proposals to transfer parkland for private use deserve the highest scrutiny. I respectfully request that instead of the limited-scope EA that has been proposed by Park Service, instead the Park Service complete a full Environmental Impact Statement (EIS) for the proposed project.

As a member of the interested public, I do not see any public benefit from the proposal. I fully support leaving the parkland in the park, and encouraging Georgetown University to look elsewhere in the region for an appropriate site.

Sincerely, Michael Capozzi 1959 39th ST NW Washington DC, 20007 202-342-1699



To: NCR\_Georgetownboathouse@nps.gov cc: Subject:

January 19, 2005

Office of Lands, Resources, and Planning

National Capital Region

National Park Service

Washington, DC

Email - NCR\_Georgetownboathouse@nps.gov

Fax - 202-401-0017

## Dear Sir/Madam:

As one of the 3 million visitors who enjoy the C&O Canal National Historical Park each year, I am deeply concerned about a proposal to take part of the park for private use. The C&O Canal NHP provides the public with the opportunity to explore the best remaining example of the canals that once were used extensively. The park is also a great place to bird, hike, bike, and watch wildlife. This proposal jeopardizes those experiences.

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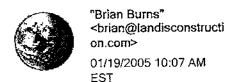
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As a member of the interested public, I do not see any public benefit from the proposal. I fully support leaving the parkland in the park, and encouraging Georgetown University to look elsewhere in the region for an appropriate site.

Sincerely,

Frank Willard



To: <NCR\_Georgetownboathouse@nps.gov> cc: <TakeAction@npca.org>

Subject: boathouse give away

January 2005

Office of Lands, Resources, and Planning National Capital Region National Park Service Washington, DC

Email - NCR Georgetownboathouse@nps.gov
Fax - 202-401-0017

Dear Sir/Madam,

I wish to express my deep concern over the proposed transfer of public parkland to private interests. The C&O Canal NHP provides the public with the opportunity to explore the best remaining example of the canals that once were used extensively. The park is also a great place to bird, hike, bike, and watch wildlife. This proposal jeopardizes those experiences.

In conjunction with the Defenders of the Potomac, the National Parks Conservation Association and the many other preservation and conservation organizations involved in trying to protect this public treasure I would like to add my questions, concerns, and comments for your assessment. Please include the following as part of the public record for the Environmental Assessment (EA) prepared for the proposed private Georgetown University Boathouse in the C&O Canal NHP:

- How would the public benefit from the loss of public parkland at the eastern gateway of the C&O Canal National Historical Park for the private use by Georgetown University?
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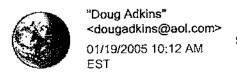
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As a member of the interested public, I do not see any public benefit from the proposal. I fully support leaving the parkland in the park, and encouraging Georgetown University to look elsewhere in the region for an appropriate site.

Sincerely,

Brian Burns C.O.O. Landis Construction Corporation

5019 Rodman Road Bethesda MD 20816 301-229-0947 202-726-3777×101



To: NCR\_Georgetownboathouse@nps.gov cc: "Cyanne Hanson" <cyanneh@earthlink.net>

Subject: Proposal to exchange land with Georgetown U for boathouse

construction

January 19, 2005

Office of Lands, Resources, and Planning National Capital Region National Park Service Washington, DC

Dear Sir/Madam:

As a long-time user of the the C&O Canal NHP, I am seriously concerned about a proposal to take part of the park for non-park use. I have ridden the tow path both ways from Cumberland to Georgetown. Once my son and I rode from Georgetown and camped along the tow path and thence to Pittsburg. In the 1970s and 1980s, before the Capital Crescent Trail was built, I was a daily commuter on the tow path from Bethesda to Capitol Hill in Washington. The proposal to swap land with Georgetown University for a boathouse jeopardizes futher experiences I expect to have in the park and those of millions of other people.

I add my voice to those of the Defenders of the Potomac, the National Parks Conservation Association and the many other preservation and conservation organizations involved in trying to protect this public treasure. I would like to add their and my questions, concerns, and comments for your assessment. Please include the following as part of the public record for the Environmental Assessment (EA) prepared for the proposed private Georgetown University Boathouse in the C&O Canal NHP:

- What would the impact of the proposal be on recreational and commutation bicycling?
- How would the public benefit from the loss of public parkland at the eastern gateway of the C&O Canal National Historical Park for the private use by Georgetown University?
- What precedent would approving this project set for future private development proposals in the Park?
- What would be the impacts on the experience of the park's approximately 3,000,000 yearly visitors from construction of the structure, and from loss of parkland at the park's eastern gateway? Please include analysis of potential traffic and public safety impacts, especially during construction but also during its operation throughout the year.
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- What is the value of the national parkland at gateway site relative to land that Georgetown proposes to exchange?

Proposals to transfer parkland for private use deserve the highest scrutiny. I respectfully request that instead of the limited-scope EA that has been proposed by Park Service, instead the Park Service complete a full Environmental Impact Statement (EIS) for the proposed project.

Without more careful analysis, I do not now see any net public benefit from the proposal. At this time, I support leaving the parkland in the park, and encouraging Georgetown University to look elsewhere in the region for an appropriate site.

Sincerely,

Douglas L. Adkins 9947 Corsica St. Vienna, VA 22181